



1401 K Street NW
Suite 600
Washington DC, 20005
Phone: (202) 640-2850

Invoice 21665

Date	Apr 01, 2016
Service Thru	Mar 31, 2016

In Reference To: General (Fees)

Date	By	Services	Hours	Rates	Amount
03/01/2016	AZ	Researched what remedies courts provide for procedural due process violations in order to draft a Brief Proposing a Remedy; spoke with Chris Muha about his research into whether, in administrative law cases, courts remand to an agency for further consideration; reviewed Mr. Muha's research in order to incorporate it into draft of Brief Proposing a Remedy.	4.50	\$ 245.00/hr	\$1,102.50
03/01/2016	JD	Reviewed Chris Muha's write-up of his administrative law research; emailed Adam Zurbriggen and Scott Bernstein regarding an idea for showing the court how long these cases usually take.	0.20	\$ 385.00/hr	\$77.00
03/01/2016	CM	Drafted a write-up on the admin law line of cases I researched where reviewing courts simply reversed, rather than remanded, improper agency decisions, and sent it to Adam Zurbriggen and Justin Dillon; conducted research into federal employment law cases to determine when courts order employees reinstated vs. when they order money damages instead.	2.60	\$ 325.00/hr	\$845.00
03/02/2016	AZ	Emailed Mr. Dillon a summary of the results of research conducted up to that point on issue of the ordinary remedy for violations of procedural due process rights and proposed a way of organizing the Brief Proposing a Remedy.	0.20	\$ 245.00/hr	\$49.00
03/02/2016	CM	Emailed Justin Dillon with a summary of my research into discrimination-based employment law remedies and whether they are helpful in our remedies briefing; reviewed Adam Zurbriggen's email to Justin Dillon about the employment law research we did and the general argument he'll make in the brief.	0.30	\$ 325.00/hr	\$97.50
03/03/2016	AZ	Researched what remedies courts provide for procedural due process violations in order to incorporate research into Brief Proposing a Remedy, specifically searching for cases addressing remedies provided in the context of college or university disciplinary proceedings.	3.50	\$ 245.00/hr	\$857.50
03/04/2016	CM	Conducted legal research for Adam Zurbriggen looking for cases where courts have disallowed successive prosecutions based on unfairness to the defendant or the burdens associates with successive prosecution, which underlie the bar on Double Jeopardy; sent Adam Zurbriggen a good EDVA case to cite in the	0.60	\$ 325.00/hr	\$195.00

brief on not giving the government a second, better chance at proving conduct they were already aware of.

03/04/2016	AZ	Drafted Brief Proposing a Remedy, specifically preliminary statement section of the brief; researched cases on double jeopardy in order to argue that fairness principles described in these cases require that new disciplinary proceedings for incidents apart from the one that allegedly occurred on October 27, 2013, should be barred; discussed double jeopardy issue with Chris Muha; reviewed additional cases on the double jeopardy issue identified by Mr. Muha.	4.00	\$ 245.00/hr	\$980.00
03/05/2016	AZ	Drafted brief proposing a remedy, specifically preliminary statement and section addressing proper remedy for October 27, 2013, allegations and the March 2014 text message charge; reviewed Ms. Roe's appeal in order to explain in the brief why the arguments raised in the appeal did not necessitate further consideration by the University in a remand for additional proceedings; researched the average time for completion of civil lawsuit in the Eastern District of Virginia in order to support argument in the brief that litigation of a sexual misconduct case takes over a year to complete even in the fastest judicial district in the country.	7.00	\$ 245.00/hr	\$1,715.00
03/06/2016	AZ	Drafted section of Brief Proposing a Remedy addressing proper remedy for Ms. Roe's allegations of misconduct other than the October 27, 2013 incident; spoke with Mr. Dillon about arguments made in the brief and points that should be emphasized in the preliminary statement of the brief; drafted conclusion to brief; proofread and emailed brief to Mr. Dillon for his review.	10.00	\$ 245.00/hr	\$2,450.00
03/06/2016	JD	Spoke with Adam Zurbruggen about our remedies brief.	0.30	\$ 385.00/hr	\$115.50
03/07/2016	JD	Reviewed and finalized Adam Zurbruggen's draft of our remedies brief, including several revisions; discussed same with him and Matt Kaiser; spoke with Brian Walther about the possibility of settlement.	4.70	\$ 385.00/hr	\$1,809.50
03/07/2016	AZ	Revised draft of Brief Proposing a Remedy to incorporate changes suggested by Mr. Dillon and Matt Kaiser; drafted proposed order to accompany the brief; researched the average length of time needed to resolve lawsuits in other major judicial districts, in order to support argument made in the brief that litigation is long and costly; reviewed transcript of protective order hearing in order to determine if argument could be made that Ms. Roe would not be able to provide sufficient details about her allegations of sexual misconduct apart from the incident occurring on October 27, 2013; spoke to Mr. Dillon about this issue; finalized the brief and proposed order and filed them with the court.	5.00	\$ 245.00/hr	\$1,225.00
03/07/2016	MK	Read the draft remedies brief and discuss it with Justin Dillon and Adam Zurbruggen.	0.40	\$ 445.00/hr	\$178.00
03/20/2016	JD	Reviewed GMU's response brief on the remedies question; emailed Adam Zurbruggen my thoughts about it and outlined some potential arguments.	0.50	\$ 385.00/hr	\$192.50
03/21/2016	AZ	Reviewed Defendants' Response to our Brief Proposing a Remedy; reviewed cases cited by Defendants in their Response; searched for cases in which the court barred additional proceedings after finding a procedural due process violations, in order to incorporate such cases into our Reply to Defendants' Response.	3.50	\$ 245.00/hr	\$857.50
03/21/2016	JD	Discussed our reply brief with Adam Zurbruggen.	0.10	\$ 385.00/hr	\$38.50
03/22/2016	AZ	Drafted Reply to Defendants' Response to our Brief Proposing a Remedy, specifically introduction and section addressing Defendants' claim that the proposed remedy would go further than	7.00	\$ 245.00/hr	\$1,715.00

restoring the status quo before the due process violations.

03/22/2016	JD	Discussed content of reply brief with Adam Zurbruggen.	0.10	\$ 385.00/hr	\$38.50
03/23/2016	AZ	Drafted Reply to Defendants' Response to our Brief Proposing a Remedy, specifically section addressing Defendants' arguments that determining which allegations could be adjudicated in further disciplinary proceedings by the University would be premature; revised the reply based on Mr. Dillon's comments; finalized and filed the reply with the court.	6.50	\$ 245.00/hr	\$1,592.50
03/23/2016	JD	Reviewed and edited remedies reply brief and discussed same with Adam Zurbruggen; spoke with Brian Walther of GMU about the possibility of a settlement.	1.40	\$ 385.00/hr	\$539.00
03/28/2016	AZ	Spoke with Defendants' counsel regarding our position on whether Defendants are required to take action before the court enters a final order concerning the proper remedy.	0.10	\$ 245.00/hr	\$24.50
03/31/2016	JD	Reviewed briefs and cases in preparation for tomorrow's oral argument on what the proper remedy in this case should be; discussed same with Adam Zurbruggen.	4.50	\$ 385.00/hr	\$1,732.50
03/31/2016	AZ	Spoke with Mr. Dillon in preparation for upcoming hearing regarding appropriate remedy, discussing questions likely to be asked and responses to those questions; reviewed Brief Proposing a Remedy and key cases in order to come up with a set of factors that could be proposed to the court for determining when additional disciplinary proceedings should be prohibited by a court after a university violates its student's due process rights; organized exhibits cited in the Brief Proposing a Remedy likely to be needed in hearing; prepared an outline for Mr. Dillon to use to prepare for hearing.	5.90	\$ 245.00/hr	\$1,445.50

Total Hours 72.90 hrs

Total Fees \$19,872.50

Total Invoice Amount \$19,872.50

Previous Balance \$0.00

Balance (Amount Due) \$0.00

Payment History:

Date	Type	Payment Description	Amount
4/1/2016	Payment - Trust Account		(\$19,872.50)

Trust Account Summary**Billing Period: 03/01/2016 - 04/01/2016****Project: General**

Total Deposits		Total Disbursements	Current Balance	
\$9,587.75		\$29,460.25	\$15,127.50	
Date	Transaction	Deposit	Disbursement	Balance
03/01/2016	Applied to invoice #21613		\$9,587.75	\$25,412.25
03/22/2016	Received From: [REDACTED]	\$9,587.75		\$35,000.00
04/01/2016	Applied to invoice #21665		\$19,872.50	\$15,127.50



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Invoice 21613

Date	Mar 01, 2016
Service Thru	Feb 29, 2016

In Reference To: General (Fees)

Date	By	Services	Hours	Rates	Amount
02/01/2016	AZ	Assembled, printed, and organized cases for Mr. Dillon's review in preparation for hearing on motions for summary judgment; reviewed Defendants' reply brief in support of their motion for summary judgment.	3.10	\$ 245.00/hr	\$759.50
02/02/2016	JD	Began reviewing cases cited in briefs in preparation for summary judgment argument.	0.40	\$ 385.00/hr	\$154.00
02/04/2016	JD	Reviewed cases and pleadings in preparation for tomorrow's summary judgment hearing; discussed same with Adam Zurbriggen.	3.60	\$ 385.00/hr	\$1,386.00
02/04/2016	AZ	Assembled exhibits to summary judgment motion so that Mr. Dillon would have them during the hearing on the motions for summary judgment; spoke to Mr. Dillon to review key points for the hearing.	0.30	\$ 245.00/hr	\$73.50
02/05/2016	AZ	Travelled to and from U.S. Courthouse in Alexandria, Virginia for hearing on motions for summary judgment and attended hearing.	3.50	\$ 245.00/hr	\$857.50
02/05/2016	JD	Prepared for oral argument of, and argued, summary judgment motion; discussed same with [REDACTED] and [REDACTED] after the hearing; traveled to and from the hearing.	5.00	\$ 385.00/hr	\$1,925.00
02/18/2016	JD	Reviewed documents accidentally not produced buy GMU and emailed with David Drummey about them.	0.20	\$ 385.00/hr	\$77.00
02/25/2016	JD	Reviewed opinion granting our motion for summary judgment; discussed same with [REDACTED], [REDACTED] and Mr. Zurbriggen.	1.10	\$ 385.00/hr	\$423.50
02/26/2016	AZ	Reviewed judge's opinion granting a motion for summary judgment; participated in a telephone conversation with Mr. Dillon and other attorneys practicing in the area of campus disciplinary proceedings, in order to discuss possible approaches to the brief proposing a remedy.	1.25	\$ 245.00/hr	\$306.25
02/29/2016	CM	Met with Justin Dillon and Adam Zurbriggen to brainstorm about ideas and avenues of research for the remedies briefing; conducted research into DC Circuit cases, and cases in other jurisdictions, on when it's appropriate to vacate and reverse an	6.60	\$ 325.00/hr	\$2,145.00

agency decision rather than vacate and remand.

02/29/2016	AZ	Discussed with Mr. Dillon and Chris Muha the necessary research tasks and approach to drafting the brief proposing a remedy; researched what types of remedies courts have provided for procedural due process violations.	4.00	\$ 245.00/hr	\$980.00
02/29/2016	JD	Met with Chris Muha and Adam Zurbriggen to discuss remedies brief, brainstorm ideas, and divide research assignments.	1.30	\$ 385.00/hr	\$500.50

Total Hours	30.35 hrs
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Total Fees	\$9,587.75
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Total Invoice Amount	\$9,587.75
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Previous Balance	\$0.00
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Balance (Amount Due)	\$0.00
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Payment History:

Date	Type	Payment Description	Amount
3/1/2016	Payment - Trust Account		(\$9,587.75)

Trust Account Summary**Billing Period: 02/01/2016 - 03/01/2016****Project: General**

Total Deposits		Total Disbursements	Current Balance	
\$20,969.75		\$30,557.50	\$25,412.25	
Date	Transaction	Deposit	Disbursement	Balance
02/01/2016	Applied to invoice #21571		\$20,969.75	\$14,030.25
02/23/2016	Received From: [REDACTED]	\$20,969.75		\$35,000.00
03/01/2016	Applied to invoice #21613		\$9,587.75	\$25,412.25



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Invoice 21571

Date	Feb 01, 2016
Service Thru	Jan 31, 2016

In Reference To: General (Fees)

Date	By Services	Hours	Rates	Amount
01/04/2016	AZ Placed call to Judge's Chambers to inquire about whether Final Pretrial Conference would be canceled; sent email to opposing counsel informing them that we had contacted the Judge's Chambers and that a motion to cancel the final pretrial conference may not be necessary.	0.50	\$ 245.00/hr	\$122.50
01/05/2016	AZ Conducted legal research to find new and additional cases to include in a motion for summary judgment on our due process and First Amendment claims; incorporated additional due process cases into the previously drafted motion for summary judgment; checked cases cited in our previously prepared draft of a motion for summary judgment, to see if those cases remain good law or had been cited favorably in subsequent cases; participated in a call with Mr. Dillon and opposing counsel regarding whether we would agree to dismiss Angel Cabrera as a party.	5.30	\$ 245.00/hr	\$1,298.50
01/05/2016	JD Spoke with David Drummey and Brian Walther about whether we would agree to dismiss Angel Cabrera as a defendant.	0.20	\$ 385.00/hr	\$77.00
01/06/2016	AZ Revised previously drafted motion for summary judgment, specifically sections addressing due process claims; reviewed documents produced by Defendants and deposition transcripts to incorporate into the Motion.	4.50	\$ 245.00/hr	\$1,102.50
01/08/2016	AZ Reviewed the settlement letter previously sent to the magistrate judge in the case, in order to select portions of the deposition testimony highlighted in that letter that should be integrated into the draft of the summary judgment motion; reviewed deposition preparation outlines previously put together for the depositions in the case, in order to select relevant documents listed in those outlines that should be discussed in the motion for summary judgment; spoke with Mr. Dillon about the drafting of the summary judgment motion, and how the motion should be structured.	5.10	\$ 245.00/hr	\$1,249.50
	Revised the motion for summary judgment; specifically, incorporated relevant excerpts from the deposition testimony in the case and documents produced by the University into due process sections regarding Defendants' bias, the ex parte meeting with Ms. Roe during the appeal and the failure to provide an explanation for			

01/11/2016	AZ	the decision; drafted an additional section of the Motion for Summary Judgment addressing the failure of Defendants to provide Mr. [REDACTED] notice of the allegations for which he was ultimately found responsible, allegations other than the October 27, 2013, incident; researched cases on what kind of notice is required by due process, in order to support this argument.	7.00	\$ 245.00/hr	\$1,715.00
01/12/2016	AZ	Revised motion for summary judgment; specifically, expanded section addressing Mr. [REDACTED]'s First Amendment claim, integrating Defendant Ericson's deposition testimony on the issue; drafted a statement of undisputed material facts to be included in the motion for summary judgment, as required by the local rules; reviewed local rules to determine how this statement should be drafted; added references in the statement of undisputed material facts to relevant documents produced by Defendants or by Defendants' Answer in the case; sent a draft of the summary judgment motion to Mr. Dillon for his review.	8.00	\$ 245.00/hr	\$1,960.00
01/13/2016	JD	Reviewed and edited two drafts of Adam Zurbruggen's draft motion for summary judgment; emailed with him about same.	1.30	\$ 385.00/hr	\$500.50
01/13/2016	AZ	Reviewed comments and revisions to the draft of motion for summary judgment provided by Mr. Dillon; made revisions to the summary judgment motion based on additional revisions requested by Mr. Dillon; emailed Mr. Dillon attaching a draft incorporating changes.	4.50	\$ 245.00/hr	\$1,102.50
01/14/2016	JD	Discussed summary judgment brief and redaction issues with Adam Zurbruggen.	0.20	\$ 385.00/hr	\$77.00
01/14/2016	AZ	Reviewed new draft of the summary judgment motion provided by Mr. Dillon; prepared a list of exhibits to include with the final version of the summary judgment motion; replaced placeholders in the draft referencing documents in the record with exhibit numbers based on the exhibits list; reviewed documents on the exhibits list, including complete deposition transcripts, for places where real names or personally identifiable information was used in order to redact this information; redacted documents on the exhibits list; communicated with opposing counsel about acquiring a panel hearing transcript and deposition transcripts that do not contain real names or personally identifiable information, and the importance of redacting other documents that are publicly filed.	6.50	\$ 245.00/hr	\$1,592.50
01/15/2016	AZ	Finalized summary judgment motion and exhibits for filing; specifically, conducted additional review to ensure that no real names or personally identifiable information was contained in the materials to be filed publicly; filed the motion with the court's online system; arranged for courtesy hard copy of the motion and the exhibits to be delivered to the clerk.	2.00	\$ 245.00/hr	\$490.00
01/18/2016	AZ	Reviewed Defendants' Motion for Summary Judgment and made notes on the motion in preparation for drafting a brief opposing it.	0.90	\$ 245.00/hr	\$220.50
01/19/2016	AZ	Reviewed statement of undisputed material facts in Defendants' Motion for Summary Judgment and examined the documents cited by Defendants in the statement in order to determine which factual assertions should be disputed in our response; reviewed exhibits to Defendants' Motion for Summary Judgment to determine if real names or personally identifiable information was included in their exhibits; emailed opposing counsel to inform them of their inclusion of unredacted documents containing real names, and asking them to strike those documents from the public record; spoke with opposing counsel about method by which they would strike the documents from the public record; drafted and filed a notice setting our Motion for Summary Judgment for a hearing.	6.20	\$ 245.00/hr	\$1,519.00
		Drafted Response to Defendants' Motion for Summary Judgment,			

01/21/2016	AZ	specifically paragraphs 1 through 29 of the section responding to Defendants' statement of undisputed material facts.	1.90	\$ 245.00/hr	\$465.50
01/22/2016	AZ	Drafted Response to Defendants' Motion for Summary Judgment, specifically paragraphs 30 through 49 of the section responding to Defendants' statement of undisputed material facts, and preliminary statement section of the Brief; spoke with Mr. Dillon about Defendants' Motion for Summary Judgment and our approach in responding to the Motion.	3.90	\$ 245.00/hr	\$955.50
01/24/2016	AZ	Drafted Brief in Opposition to Defendants' Motion for Summary Judgment, specifically preliminary statement and argument sections addressing Defendants' arguments as to why [REDACTED] s procedural due process and First Amendment claims should be dismissed; reviewed cases cited by Defendants in their motion for summary judgment in order to determine whether a response to any of the cited cases is necessary.	12.00	\$ 245.00/hr	\$2,940.00
01/25/2016	JD	Reviewed and edited Adam Zurbriggen's draft of our response to GMU's summary judgment motion; discussed same with him.	2.70	\$ 385.00/hr	\$1,039.50
01/25/2016	AZ	Reviewed Mr. Dillon's revisions to a draft of our Brief in Opposition to Defendants' Motion for Summary Judgment; made revisions to the Brief to incorporate changes requested by Mr. Dillon; emailed Mr. Dillon providing the revised draft; reviewed final draft provided by Mr. Dillon; drafted a proposed order denying Defendants' Motion for Summary Judgment and granting our Motion for Summary Judgment; finalized the draft of the Brief in Opposition and the Proposed Order and filed the documents with the Court.	3.25	\$ 245.00/hr	\$796.25
01/26/2016	JD	Reviewed GMU's opposition to our summary judgment motion.	0.10	\$ 385.00/hr	\$38.50
01/27/2016	AZ	Reviewed Defendants' Memorandum in Opposition to our Motion for Summary Judgment; made notes for issues which should be discussed in our Reply Brief; reviewed cases cited by in the Memorandum to determine whether a response to any of the cases should be included in the Reply Brief.	1.80	\$ 245.00/hr	\$441.00
01/27/2016	JD	Emailed with [REDACTED] and [REDACTED] about case; discussed reply brief with Adam Zurbriggen; discussed GW's errata sheets with David Drummey and reviewed the first of two of them.	0.60	\$ 385.00/hr	\$231.00
01/28/2016	AZ	Drafted Reply Brief responding to Defendants' Opposition to our Motion for Summary Judgment; emailed Mr. Dillon providing the draft for his review.	13.70	\$ 245.00/hr	\$3,356.50
01/29/2016	JD	Reviewed and edited Adam Zurbriggen's draft of reply brief in support of our summary judgment motion and discussed same with him; reviewed GMU's reply brief.	1.00	\$ 385.00/hr	\$385.00
01/29/2016	AZ	Reviewed Mr. Dillon's revisions to the Reply Brief; finalized and filed the Reply Brief using the court's online filing system.	1.20	\$ 245.00/hr	\$294.00

Total Hours	94.35 hrs
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Total Fees	\$23,969.75
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Total Invoice Amount	\$23,969.75
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Invoice Amount After (\$3,000.00) Discount	\$20,969.75
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Previous Balance	\$0.00
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Balance (Amount Due)	\$0.00
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Payment History:

Date	Type	Payment Description	Amount
2/1/2016	Payment - Trust Account		(\$20,969.75)

Trust Account Summary**Billing Period: 01/01/2016 - 02/01/2016****Project: General**

Total Deposits		Total Disbursements	Current Balance	
\$11,077.50		\$32,047.25	\$14,030.25	
Date	Transaction	Deposit	Disbursement	Balance
01/04/2016	Applied to invoice #21524		\$11,077.50	\$23,922.50
01/28/2016	Received From: [REDACTED]	\$11,077.50		\$35,000.00
02/01/2016	Applied to invoice #21571		\$20,969.75	\$14,030.25



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Phone: (202) 640-2850

Invoice 21524

Date	Jan 04, 2016
Service Thru	Dec 31, 2015

In Reference To: General (Fees)

Date	By	Services	Hours	Rates	Amount
12/01/2015	AZ	Reviewed the conclusion section of Mr. Dillon's final draft of the confidential settlement memorandum to the magistrate judge and suggested additional details to include in that conclusion section.	0.20	\$ 245.00/hr	\$49.00
12/01/2015	JD	Finalized and sent confidential settlement statement to Judge Nachmanoff; reviewed and responded to email from [REDACTED] about same; called [REDACTED] and [REDACTED] to obtain their approval of our statement; reviewed GMU's non-confidential statement.	2.30	\$ 385.00/hr	\$885.50
12/02/2015	JD	Researched, in the Title VII and Title IX contexts, how often courts directly order reinstatement of a prevailing discrimination victim rather than simply ordering damages or a "do over"; discussed same with Adam Zurbriggen; discussed same with David Drummey of GMU in advance of tomorrow's settlement conference.	0.80	\$ 385.00/hr	\$308.00
12/03/2015	AZ	Assembled documents for upcoming settlement conference; travelled to and from U.S. Courthouse in Alexandria, Virginia for settlement conference; attended and participated in settlement conference.	14.00	\$ 245.00/hr	\$3,430.00
12/03/2015	JD	Prepared for, traveled to and from, and attended settlement conference.	14.50	\$ 385.00/hr	\$5,582.50
12/07/2015	JD	Emailed with David Drummey and spoke with Brian Walther about our attorneys fees and related settlement issues.	0.20	\$ 385.00/hr	\$77.00
12/08/2015	JD	Emailed with Brian Walther and David Drummey about continuing the pretrial conference; reviewed their draft of motion to do same.	0.20	\$ 385.00/hr	\$77.00
12/11/2015	JD	Spoke with Brian Walther about the status of settlement negotiations.	0.20	\$ 385.00/hr	\$77.00
12/21/2015	AZ	Spoke with University's counsel, David Drummey, regarding his concerns about rescheduling the trial date for March or April, his desire to suggest to the court an earlier trial date and more aggressive briefing schedule for the summary judgment motions, and his desire that we drop the University President, Angel Cabrera, as a defendant in the case; sent Mr. Dillon an email relaying these comments and concerns.	0.75	\$ 245.00/hr	\$183.75
		Spoke with Brian Walther and David Drummey about Virginia's			

12/21/2015	JD	unwillingness to settle and what should happen next; drafted language for motion to move trial date and set summary judgment briefing schedule and sent it to them; reviewed and responded to emails from [REDACTED] and [REDACTED] about what happens next.	0.90	\$ 385.00/hr	\$346.50
12/23/2015	AZ	Reviewed the court's order canceling the trial date and setting a schedule for briefing motions for summary judgment; contacted judge's chambers to inquire about why the order did not also cancel the upcoming final pretrial conference, but was unable to reach someone in the judge's chambers; left a message for someone in the judge's chambers to return my call.	0.25	\$ 245.00/hr	\$61.25

Total Hours	34.30 hrs
Total Fees	\$11,077.50
Total Invoice Amount	\$11,077.50
Previous Balance	\$0.00
Balance (Amount Due)	\$0.00

Payment History:

Date	Type	Payment Description	Amount
1/4/2016	Payment - Trust Account		(\$11,077.50)

Trust Account Summary**Billing Period: 12/01/2015 - 01/04/2016****Project: General**

Total Deposits		Total Disbursements	Current Balance	
\$17,538.00		\$28,615.50	\$23,922.50	
Date	Transaction	Deposit	Disbursement	Balance
12/01/2015	Applied to invoice #21485		\$17,538.00	\$17,462.00
12/16/2015	Received From: [REDACTED]	\$17,538.00		\$35,000.00
01/04/2016	Applied to invoice #21524		\$11,077.50	\$23,922.50



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Invoice 21485

Date	Dec 01, 2015
Service Thru	Nov 30, 2015

In Reference To: General (Fees)

Date	By	Services	Hours	Rates	Amount
11/02/2015	AZ	Reviewed pages 1-171 of the Brent Ericson deposition transcript; made notes on admissions made by Mr. Ericson in order to highlight those admissions in settlement discussions with Defendants' counsel; participated in a telephone discussion with Mr. Dillon and [REDACTED] in which mock deposition questions were posed to [REDACTED] in preparation for his upcoming deposition.	3.60	\$ 245.00/hr	\$882.00
11/02/2015	JD	Spoke with David Drummey about scheduling mediation and when we can expect to see a privilege log; held final deposition preparation session (by phone) with [REDACTED] and Adam Zurbriggen.	1.60	\$ 385.00/hr	\$616.00
11/03/2015	AZ	Reviewed pages 171 to 263 of the transcript of Brent Ericson's deposition, in order to note highlights for use in settlement negotiations or at trial; spoke with Mr. Dillon about response to e-mail from Defendants' counsel regarding text messages between [REDACTED] and [REDACTED]; responded to this email; reviewed pages 1 to 74 of the transcript of Juliet Blank-Godlove's deposition, in order to note highlights for use in settlement negotiations or at trial; organized documents in case needed at upcoming deposition of [REDACTED].	4.40	\$ 245.00/hr	\$1,078.00
11/03/2015	JD	Collected materials and spoke to Adam Zurbriggen regarding [REDACTED]'s deposition tomorrow; reviewed documents in preparation for same; reviewed and responded to emails from David Drummey regarding mediation and discovery requests.	0.30	\$ 385.00/hr	\$115.50
11/04/2015	JD	Defended [REDACTED]'s deposition at GMU and discussed same with him before and after deposition; traveled to and from deposition.	8.30	\$ 385.00/hr	\$3,195.50
11/04/2015	AZ	Travelled to George Mason University to defend deposition of [REDACTED]; defended deposition of [REDACTED] spoke with [REDACTED] and Mr. Dillon about the effects of the deposition for the possibility of settlement and for trial.	8.00	\$ 245.00/hr	\$1,960.00
11/05/2015	JD	Spoke with Brian Walther about getting a transcript of [REDACTED]'s deposition and settlement issues, including our need to make sure that the right decisionmaker is present from their side at any mediation; reviewed and revised Adam Zurbriggen's proposed	0.20	\$ 385.00/hr	\$77.00

errata for [REDACTED]'s deposition.

11/05/2015	AZ	Reviewed pages 75 to 150 of the transcript of Juliet Blank-Godlove's deposition, in order to note highlights for use in settlement negotiations or at trial; emailed Counsel for Defendants about renumbering their supplemental response to our request for production of documents; reviewed pages 1 to 165 of the Defendants' supplemental response to our request for production of documents; reviewed the transcript of [REDACTED]'s deposition and made notes on possible errors to discuss with him for certifying the transcript.	7.70	\$ 245.00/hr	\$1,886.50
11/06/2015	JD	Spoke with Adam Zurbruggen about today's meeting with [REDACTED] to review his transcript, including how to do corrections; met briefly with [REDACTED] regarding same; discussed mediation and GMU's lack of willingness to settle with David Drummey and Adam Zurbruggen.	0.60	\$ 385.00/hr	\$231.00
11/06/2015	AZ	Spoke with Mr. Dillon about [REDACTED]'s review of his deposition transcript and the preparation of the errata sheet to be submitted in certifying the transcript; reviewed pages 166 to 190 of the Defendants' supplemental response to our request for production of documents; spoke with [REDACTED] about [REDACTED]; reviewed errors in the transcript identified by [REDACTED]; created an errata sheet to be submitted in certifying [REDACTED]'s transcript, noting the errors [REDACTED] identified; reviewed privilege logs provided by counsel for Defendants in order to assess whether claims of privilege asserted in withholding or redacting certain documents are valid; participated in telephone conversation with Mr. Dillon and counsel for Defendants concerning the prospects for settlement and approach to the court-ordered settlement conference.	6.30	\$ 245.00/hr	\$1,543.50
11/06/2015	CM	Spoke with Adam Zurbruggen about the sufficiency of the university's privilege log, the standards that privilege logs must meet, and suggesting for writing a letter to the university explaining why their log is insufficient.	0.10	\$ 325.00/hr	\$32.50
11/09/2015	AZ	Spoke with Mr. Dillon about [REDACTED]'s revisions to his deposition transcript for inclusion with the errata sheet; made revisions to the attachment to the errata sheet based on Mr. Dillon's suggestions; called the reporting company that transcribed [REDACTED]'s deposition to ensure correct procedure for submitting the errata sheet; emailed the errata sheet attachment to [REDACTED] for his signature.	0.70	\$ 245.00/hr	\$171.50
11/09/2015	JD	Discussed deposition errata issues with Adam Zurbruggen; spoke with David Drummey regarding judge's request that the parties have a settlement conference; reviewed and responded to email from magistrate judge's law clerk about the fact that we are being ordered to attend a settlement conference.	0.50	\$ 385.00/hr	\$192.50
11/10/2015	JD	Spoke with Adam Zurbruggen, David Drummey, and Brian Walther regarding moving the final pretrial conference in order to save time and money; spoke with Mr. Drummey and emailed the magistrate judge's law clerk about our request that someone with settlement authority attend the settlement conference; filed motion to continue pretrial conference; participated in conference call with magistrate judge and George Mason attorneys regarding settlement conference.	1.20	\$ 385.00/hr	\$462.00
11/10/2015	AZ	Spoke with Mr. Dillon about documents that we would need to prepare and assemble in preparation for the upcoming final pretrial conference; reviewed civil procedure rules and local court rules regarding what documents would need to be prepared and submitted before the final pretrial conference; drafted a joint motion to continue the final pretrial conference until after the upcoming	2.10	\$ 245.00/hr	\$514.50

settlement conference; filed the motion to continue the final pretrial conference.

11/13/2015	AZ	Spoke with Defendants' counsel, David Drummey, regarding the Defendants' production of additional documents responsive to our discovery requests, particularly training materials, as well as Defendants' intention to have a University Vice President, Rose Pascarell, serve as a proxy for Angel Cabrera at the upcoming settlement conference; reviewed email from Mr. Drummey, noting that the responsive documents we discussed on the phone earlier were still being located and requesting an extension of the discovery deadline; spoke with Matt Kaiser and Chris Muha about responding to Mr. Drummey's email and providing a short extension to the discovery deadline; drafted and sent an email to Mr. Drummey providing a short extension to the discovery deadline for the limited purpose of producing the additional responsive documents.	1.20	\$ 245.00/hr	\$294.00
11/16/2015	AZ	Reviewed email from Defendants' counsel, David Drummey, regarding whether University President Angel Cabrera remains a proper party to the case following discovery and whether we would be willing to drop him or substitute him for another party; reviewed email from Mr. Drummey providing additional training material documents responsive to our discovery requests; emailed Mr. Dillon, relaying my thoughts on maintaining Angel Cabrera as a party; drafted email for Mr. Dillon to send to Mr. Drummey providing our position that Angel Cabrera (or a person with the necessary authority to reinstate [REDACTED]) should remain a party, and objecting to the University's choice of Vice President Rose Pascarell as a proxy for the University and Angel Cabrera at the settlement conference.	1.70	\$ 245.00/hr	\$416.50
11/17/2015	JD	Reviewed and revised Adam Zurbriggen's draft email responding to David Drummey's email about substituting someone else for President Cabrera in the case and at the settlement conference; reviewed email from Mr. Drummey and called him in response to that email.	0.10	\$ 385.00/hr	\$38.50
11/18/2015	JD	Spoke with David Drummey and Brian Walther about issues related to settlement conference, including who should attend from GMU.	0.40	\$ 385.00/hr	\$154.00
11/19/2015	JD	Reviewed email and letter from Judge Nachmanoff about our settlement letters; emailed with [REDACTED] and [REDACTED] about same; discussed same with Adam Zurbriggen.	0.10	\$ 385.00/hr	\$38.50
11/20/2015	JD	Spoke with David Drummey about who should be present at the settlement conference and the fact that it may need to be moved to another date; discussed related issues with Adam Zurbriggen.	0.20	\$ 385.00/hr	\$77.00
11/24/2015	JD	Began drafting settlement statement and confidential settlement statement; discussed same with Adam Zurbriggen; emailed draft of settlement statement to [REDACTED] and [REDACTED]	2.30	\$ 385.00/hr	\$885.50
11/24/2015	AZ	Reviewed and revised Mr. Dillon's draft of a settlement memorandum to be exchanged with counsel for Defendants; discussed the draft with Mr. Dillon as well as approach in drafting the separate, confidential settlement letter to the magistrate judge in preparation for the upcoming settlement conference.	0.50	\$ 245.00/hr	\$122.50
11/25/2015	JD	Reviewed and responded to email from [REDACTED] about our draft settlement letter.	0.20	\$ 385.00/hr	\$77.00
		Reviewed and expanded Mr. Dillon's draft of a confidential settlement letter to the magistrate judge, specifically a section of the letter evaluating the merits of [REDACTED]'s remaining claims, in preparation for the upcoming settlement conference; reviewed			

11/25/2015	AZ	notes of key admissions made by Brent Ericson in his deposition for inclusion in the confidential settlement letter; reviewed previously drafted partial summary judgment motion on procedural due process and First Amendment claims in order to select legal authorities to include in the confidential settlement letter.	5.80	\$ 245.00/hr	\$1,421.00
11/30/2015	JD	Reviewed and began revising Adam Zurbruggen's draft of our confidential settlement statement; finalized and sent to GMU and magistrate judge our non-confidential settlement statement; emailed about same with David Drummey of GMU.	2.70	\$ 385.00/hr	\$1,039.50

In Reference To: General (Expenses)

Date	By	Expenses	Amount
11/06/2015	JD	Parking	\$16.00

Total Hours	60.80 hrs
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Total Fees	\$17,522.00
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Total Expenses	\$16.00
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Total Invoice Amount	\$17,538.00
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Previous Balance	\$0.00
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Balance (Amount Due)	\$0.00
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Payment History:

Date	Type	Payment Description	Amount
12/1/2015	Payment - Trust Account		(\$17,538.00)

Trust Account Summary**Billing Period: 11/01/2015 - 12/01/2015****Project: General**

Total Deposits	Total Disbursements	Current Balance
\$33,305.00	\$50,893.00	\$17,462.00

Date	Transaction	Deposit	Disbursement	Balance
11/02/2015	Applied to invoice #21442		\$33,355.00	\$1,695.00
11/18/2015	Received From: [REDACTED]	\$33,305.00		\$35,000.00
12/01/2015	Applied to invoice #21485		\$17,538.00	\$17,462.00



1401 K Street NW
Suite 600
Washington DC, 20005
Phone: (202) 640-2850

Invoice 21442

Date	Nov 02, 2015
Service Thru	Oct 31, 2015

In Reference To: General (Fees)

Date	By	Services	Hours	Rates	Amount
10/01/2015	AZ	Drafted reply to Defendants' response to Motion to Reconsideration of judge's decision to dismiss the substantive due process and Title IX claims; reviewed cases discussed in the Motion in preparation for arguing Motion before the Court; made notes on key points to make during the argument; participated in a mock argument on the Motion with Mr. Dillon.	9.50	\$ 245.00/hr	\$2,327.50
10/01/2015	JD	Edited, finalized, and filed our reply brief for the motion for reconsideration; helped prepare Adam Zurbruggen to argue the motion during tomorrow's hearing.	1.30	\$ 385.00/hr	\$500.50
10/02/2015	AZ	Travelled to and from U.S. Courthouse in Alexandria for status hearing before judge and hearing on Motion for Reconsideration of judge's decision to dismiss the substantive due process and Title IX claims; participated in status hearing before the Court; filed noticed of appearance with the court clerk in order to be able to participate in case.	4.00	\$ 245.00/hr	\$980.00
10/02/2015	JD	Participated in status hearing and hearing regarding our motion for reconsideration; emailed [REDACTED] and [REDACTED] about same; travelled to and from courthouse.	3.70	\$ 385.00/hr	\$1,424.50
10/05/2015	JD	Emailed with GMU and [REDACTED] regarding scheduling his deposition; emailed with our office manager about same.	0.10	\$ 385.00/hr	\$38.50
10/06/2015	AZ	Reviewed federal and local civil procedure rules regarding how depositions must be formally noticed; drafted notices of deposition for Brent Ericson, Juliet Blank-Godlove, and Angel Cabrera; emailed Mr. Dillon about whether we should formally notice Angel Cabrera and about the timeline for noticing the depositions.	1.20	\$ 245.00/hr	\$294.00
10/06/2015	JD	Spoke with Matt Kaiser and Rebecca LeGrand about [REDACTED]; emailed with [REDACTED] and [REDACTED] about same; emailed with Adam Zurbruggen about deposition notices; emailed with David Drummey of GMU about scheduling and related issues.	0.30	\$ 385.00/hr	\$115.50
10/07/2015	AZ	Finalized formal notices of deposition for Brent Ericson and Juliet Blank-Godlove; emailed Defendants' counsel to provide the notices and to notify them that we would not be deposing Angel Cabrera.	0.30	\$ 245.00/hr	\$73.50

10/13/2015	JD	Discussed deposition strategy with Adam Zurbriggen; emailed with GMU about scheduling.	0.30	\$ 385.00/hr	\$115.50
		Submitted audio files of September 5, 2014, Sexual Misconduct Board hearing to transcription service; reviewed transcription to add names of the speakers, in preparation for use of the transcript in depositions; spoke with Mr. Dillon about preparation for depositions; reviewed chart of previous sexual misconduct proceedings at George Mason University; emailed counsel for Defendants requesting information concerning previous sexual misconduct proceedings that was missing from the produced materials.			
10/13/2015	AZ	Defendants requesting information concerning previous sexual misconduct proceedings that was missing from the produced materials.	1.00	\$ 245.00/hr	\$245.00
		Note: This work took 5 hours to complete, but you were billed for only 1 hour, as we are not billing you for work related to the transcription.			
		Reviewed transcription of the September 5, 2014, Sexual Misconduct Board hearing to add names of the speakers, in preparation for use of the transcript in depositions.			
10/14/2015	AZ		0.00	\$ 245.00/hr	\$0.00
		Note: This work took 3.5 hours to complete, but you were not billed for it.			
10/16/2015	AZ	Reviewed documents in preparation of deposition of Defendant Brent Ericson; prepared outline of topics and key documents to assist Mr. Dillon in preparing for deposition.	4.90	\$ 245.00/hr	\$1,200.50
		Reviewed and began editing Adam Zurbriggen's outline of topics for Brent Ericson's deposition; began thinking about possible strategy; discussed same with Mr. Zurbriggen; emailed with GMU attorneys about discovery issues, including why we want documents related to other disciplinary cases.			
10/19/2015	JD		0.80	\$ 385.00/hr	\$308.00
10/20/2015	AZ	Reviewed documents in preparation for deposition of Defendant Juliet Blank-Godlove; prepared outline for deposition.	6.40	\$ 245.00/hr	\$1,568.00
		Reviewed and compiled documents and created outline in preparation for deposition of Brent Ericson; discussed same, as well as strategy for [REDACTED], with Adam Zurbriggen; emailed with David Drummey of GMU about obtaining discovery of how prior disciplinary cases were handled by GMU.			
10/21/2015	JD		8.00	\$ 385.00/hr	\$3,080.00
		Reviewed documents in preparation for deposition of Defendant Juliet Blank-Godlove; prepared outline for deposition; reviewed draft of summary judgment motion prepared earlier, in order to refresh recollection of key facts helpful to procedural due process claims; provided Mr. Dillon with questions specifically aimed at obtaining admissions on facts helpful to procedural due process claims; printed and organized exhibits for deposition of Juliet Blank-Godlove.			
10/21/2015	AZ		9.50	\$ 245.00/hr	\$2,327.50
		Travelled to and from George Mason University for deposition of Brent Ericson; attended deposition of Brent Ericson, taking notes on the deposition and assisting Mr. Dillon with deposition exhibits; reviewed documents in preparation for deposition of Defendant Juliet Blank-Godlove; reviewed outline for deposition of Juliet Blank-Godlove.			
10/22/2015	AZ		10.50	\$ 245.00/hr	\$2,572.50
10/22/2015	JD	Attended, and traveled to and from, deposition of Brent Ericson.	7.70	\$ 385.00/hr	\$2,964.50
10/23/2015	JD	Attended deposition of Juliet Blank-Godlove and traveled to and from same with Adam Zurbriggen.	7.00	\$ 385.00/hr	\$2,695.00
		Reviewed documents in preparation for deposition of Defendant Juliet Blank-Godlove; reviewed outline for deposition of Juliet Blank-Godlove; travelled to and from George Mason University for deposition of Juliet Blank-Godlove; took the deposition of Juliet			
10/23/2015	AZ		8.30	\$ 245.00/hr	\$2,033.50

Blank-Godlove.

Reviewed copies of documents produced by University in order to destroy all copies of document that was inadvertently produced by Defendants' counsel; reviewed documents for upcoming deposition of [REDACTED] prepared outline of topics and key documents to review with [REDACTED]; reviewed transcript and supporting exhibits submitted at the protective order hearing in order to prepare [REDACTED] for upcoming deposition; reviewed portions of the Sexual Misconduct Board Hearing indicated as being significant by a document produced by Defendants; made notes on these portions of the hearing; spoke with Mr. Dillon about preparation of [REDACTED] for upcoming deposition.			
10/26/2015	AZ		6.50 \$ 245.00/hr \$1,592.50
Discussed potential rescheduling of [REDACTED]'s deposition with him and GMU.			
10/26/2015	JD		0.20 \$ 385.00/hr \$77.00
Reviewed documents for upcoming deposition of [REDACTED]; prepared outline of topics and key documents to review with [REDACTED]; reviewed transcript and supporting exhibits submitted at the protective order hearing in order to prepare [REDACTED] for upcoming deposition; reviewed portions of the Sexual Misconduct Board Hearing indicated as being significant by a document produced by Defendants; made notes on these portions of the hearing; spoke with Mr. Dillon about preparation of [REDACTED] for upcoming deposition.			
10/27/2015	AZ		7.20 \$ 245.00/hr \$1,764.00
Spoke with Adam Zurbruggen about [REDACTED] and about creating a short outline for cross-examination at trial, given what we learned during our depositions.			
10/27/2015	JD		0.50 \$ 385.00/hr \$192.50
Organized materials and reviewed deposition outline in preparation for meeting with [REDACTED] about his upcoming deposition; spoke with Mr. Dillon about preparation of [REDACTED] for upcoming deposition.			
10/28/2015	AZ		2.20 \$ 245.00/hr \$539.00
Met with [REDACTED] and Adam Zurbruggen to prepare him for his deposition; reviewed outlined and documents in preparation for same; spoke with [REDACTED] about [REDACTED].			
10/29/2015	JD		7.10 \$ 385.00/hr \$2,733.50
Participated in meeting with Mr. Dillon and [REDACTED] to prepare for [REDACTED]'s upcoming deposition; reviewed key documents with [REDACTED] and discussed strategies for responding to questions by Defendants' counsel.			
10/29/2015	AZ		6.50 \$ 245.00/hr \$1,592.50

Total Hours	115.00 hrs
Total Fees	\$33,355.00
Total Invoice Amount	\$33,355.00
Previous Balance	\$0.00
Balance (Amount Due)	\$0.00

Payment History:

Date	Type	Payment Description	Amount
11/2/2015	Payment - Trust Account		(\$33,355.00)

Trust Account Summary**Billing Period: 10/01/2015 - 11/02/2015****Project: General**

Total Deposits	Total Disbursements	Current Balance
\$15,388.50	\$48,693.50	\$1,695.00

Date	Transaction	Deposit	Disbursement	Balance
10/01/2015	Applied to invoice #21402		\$15,338.50	\$19,661.50
10/15/2015	Received From: [REDACTED]	\$15,388.50		\$35,050.00
11/02/2015	Applied to invoice #21442		\$33,355.00	\$1,695.00



1401 K Street NW
Suite 600
Washington DC, 20005
Phone: (202) 640-2850

Invoice 21402

Date	Oct 01, 2015
Service Thru	Sep 30, 2015

In Reference To: General (Fees)

Date	By	Services	Hours	Rates	Amount
09/01/2015	JD	Spoke with Brian Walther, David Drummey, and Adam Zurbriggen about GMU's decision not to extend a settlement offer at this time.	0.50	\$ 385.00/hr	\$192.50
09/01/2015	AZ	Reviewed documents submitted by [REDACTED] and information submitted by [REDACTED] in order to prepare responses and consider specific objections to Defendants' First Set of Interrogatories and Requests for Production of Documents; drafted responses to Defendants' Requests for Production of Documents; organized documents for production.	4.50	\$ 245.00/hr	\$1,102.50
09/02/2015	JD	Spoke with [REDACTED] and [REDACTED] about [REDACTED]	0.60	\$ 385.00/hr	\$231.00
09/02/2015	AZ	Participated in telephone conversation with Mr. Dillon, [REDACTED] and [REDACTED] regarding [REDACTED]; discussed documents provided by [REDACTED] for responses to University's discovery requests.	0.75	\$ 245.00/hr	\$183.75
09/03/2015	JD	Discussed case and status of discovery production with David Drummey and Adam Zurbriggen.	0.20	\$ 385.00/hr	\$77.00
09/14/2015	JD	Reviewed and responded to email from David Drummey regarding whether we will give up our damages claim.	0.10	\$ 385.00/hr	\$38.50
09/15/2015	AZ	Reviewed additional information and documentation provided by [REDACTED] for responses to University's discovery requests; revised responses to University's interrogatories and requests for production of documents; participated in a telephone conversation with [REDACTED] and Mr. Dillon discussing finalization of the responses.	4.20	\$ 245.00/hr	\$1,029.00
09/16/2015	JD	Reviewed and revised draft responses to GMU's document requests.	0.10	\$ 385.00/hr	\$38.50
09/16/2015	AZ	Spoke with Jacob Clark about Bates stamping documents for preparation of single document to provide to University in response to requests for production; reviewed final document prepared by Mr. Clark; finalized responses to University's request for production of documents and submitted responses; spoke with Mr. Dillon about need for protective order to cover documents being produced.	2.70	\$ 245.00/hr	\$661.50

09/16/2015	JC	Converted all client documents for production to pdf format; organized and compiled documents; redacted privileged information; Bates-stamped documents for production.	1.80	\$ 95.00/hr	\$171.00
09/17/2015	AZ	Reviewed judge's opinion and order modifying previous order with regards to University's Motion to Dismiss; spoke with Mr. Dillon about [REDACTED] [REDACTED]	1.70	\$ 245.00/hr	\$416.50
09/17/2015	JD	Reviewed judge's written decision on the motion to dismiss; discussed same with Adam Zurbruggen and emailed [REDACTED] and [REDACTED] about that.	1.00	\$ 385.00/hr	\$385.00
09/21/2015	JD	Reviewed [REDACTED]'s draft interrogatories; met with him and Adam Zurbruggen to discuss them and related factual issues, including [REDACTED]; spoke with Mr. Zurbruggen about filing a short motion for reconsideration and what that would look like; reviewed and responded to email from David Drummey at GMU regarding scheduling a phone call.	2.20	\$ 385.00/hr	\$847.00
09/21/2015	AZ	Met with [REDACTED] and Mr. Dillon to review and finalize responses to University's interrogatories; discussed with [REDACTED]; emailed responses to University's interrogatories to counsel for Defendants.	4.30	\$ 245.00/hr	\$1,053.50
09/22/2015	CM	Reviewed documents produced by GMU for any express consideration of gender to see if we have a basis to replead our Title IX claim.	0.40	\$ 325.00/hr	\$130.00
09/22/2015	AZ	Participated in telephone conversation with Mr. Dillon and counsel for University concerning impact of judge's decision on discovery, possibility of agreement to stipulated facts, and need for scheduling depositions; spoke with Mr. Dillon about preparation for depositions; spoke with Mr. Dillon about filing a motion for reconsideration of judge's decision to dismiss substantive due process and Title IX claims; researched civil procedure and local court rules concerning filing of a motion for reconsideration.	1.40	\$ 245.00/hr	\$343.00
09/22/2015	JD	Discussed court's decision and discovery issues with GMU attorneys, including scheduling of depositions; discussed same and a motion for reconsideration with Adam Zurbruggen.	1.20	\$ 385.00/hr	\$462.00
09/22/2015	SB	Reviewed school's production for documents to support Title IX claim. NOTE: This work took 2.7 hours to complete, but you were not charged for it.	0.00	\$ 325.00/hr	\$0.00
09/23/2015	AZ	Drafted motion for reconsideration of judge's decision to dismiss substantive due process and Title IX claims; researched the distinction between executive and legislative acts relied upon by the judge in dismissing the substantive due process claim.	4.50	\$ 245.00/hr	\$1,102.50
09/23/2015	JD	Began reviewing and taking notes on documents produced by GMU; emailed about same with Adam Zurbruggen.	3.30	\$ 385.00/hr	\$1,270.50
09/24/2015	JD	Completed initial review of GMU's first document production (roughly 2,400 pages) and culled that into a much smaller set of relevant documents for the lawsuit; emailed with Adam Zurbruggen about status of motion for reconsideration; reviewed and edited same.	3.70	\$ 385.00/hr	\$1,424.50
09/24/2015	AZ	Drafted motion for reconsideration of judge's decision to dismiss substantive due process and Title IX claims; researched the distinction between executive and legislative acts relied upon by	5.40	\$ 245.00/hr	\$1,323.00

the judge in dismissing the substantive due process claim.

09/25/2015	AZ	Proofread and finalized motion for reconsideration of judge's decision to dismiss substantive due process and Title IX claims; drafted a proposed order and notice of hearing to accompany the motion; researched civil procedure and local court rules for scheduling of hearing on the motion and timeline for Defendants' response to the motion, as well as our reply to Defendants' response; reviewed selected documents produced by Defendants in discovery, as well as Mr. Dillon's notes on those documents, in preparation of upcoming depositions.	5.75	\$ 245.00/hr	\$1,408.75
09/28/2015	JD	Began organizing culled discovery documents into folders; discussed same with paralegal Jacob Clark and Adam Zurbriggen.	1.10	\$ 385.00/hr	\$423.50
09/28/2015	JC	Created framework for a spreadsheet with information on how GMU handled past complaints of sexual misconduct.	0.20	\$ 95.00/hr	\$19.00
09/29/2015	JD	Reviewed and responded to email from David Drummey regarding discovery.	0.10	\$ 385.00/hr	\$38.50
09/29/2015	JC	Organized culled GMU-produced documents by category and chronology; created two working copies of produced documents for Justin Dillon and Adam Zurbriggen.	1.90	\$ 95.00/hr	\$180.50
09/29/2015	JC	Reviewed GMU-produced documents; looked at how GMU handled first 17 past complaints of sexual misconduct and entered information into a spreadsheet for attorney review.	2.40	\$ 95.00/hr	\$228.00
09/30/2015	JC	Reviewed GMU-produced documents: Looked at how GMU handled remaining 15 past complaints of sexual misconduct and entered information into a spreadsheet for attorney review.	2.00	\$ 95.00/hr	\$190.00
09/30/2015	AZ	Reviewed Defendants' response to Motion for Reconsideration of judge's decision to dismiss the substantive due process and Title IX claims; began drafting a reply to Defendants' response.	1.50	\$ 245.00/hr	\$367.50

Total Hours	59.50 hrs
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Total Fees	\$15,338.50
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Total Invoice Amount	\$15,338.50
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Previous Balance	\$0.00
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Balance (Amount Due)	\$0.00
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Payment History:

Date	Type	Payment Description	Amount
10/1/2015	Payment - Trust Account		(\$15,338.50)

Trust Account Summary**Billing Period: 09/01/2015 - 10/01/2015****Project: General**

Total Deposits		Total Disbursements	Current Balance	
\$9,076.50		\$34,952.00	\$19,661.50	

Date	Transaction	Deposit	Disbursement	Balance
09/01/2015	Applied to invoice #21360		\$19,613.50	\$25,923.50
09/22/2015	Received From: [REDACTED]	\$9,076.50		\$35,000.00
10/01/2015	Applied to invoice #21402		\$15,338.50	\$19,661.50



1401 K Street NW
Suite 600
Washington DC, 20005
Phone: (202) 640-2850

Invoice 21360

Date	Sep 01, 2015
Service Thru	Aug 31, 2015

In Reference To: General (Fees)

Date	By	Services	Hours	Rates	Amount
08/03/2015	AZ	Drafted motion for partial summary judgment, specifically section addressing whether unexplained reversal of disciplinary hearing panel decision violated procedural due process; searched for cases that help support arguments made in that section.	6.20	\$ 245.00/hr	\$1,519.00
08/03/2015	JD	Discussed settlement offer with [REDACTED]'s attorney; discussed [REDACTED]; discussed settlement and discovery issues with David Drummey from GMU.	1.20	\$ 385.00/hr	\$462.00
08/04/2015	AZ	Reviewed Defendants' first set of requests for production of documents and first set of interrogatories; researched local rules for deadline to object and respond to the requests; drafted motion for partial summary judgment, specifically section addressing whether unexplained reversal of disciplinary hearing panel decision violated procedural due process claims; searched for cases that help support arguments made in that section.	6.50	\$ 245.00/hr	\$1,592.50
08/04/2015	JD	Began reviewing initial discovery requests; emailed with David Drummey about same; discussed same with Adam Zurbruggen.	0.10	\$ 385.00/hr	\$38.50
08/05/2015	JD	Discussed discovery-related issues with Adam Zurbruggen; emailed with David Drummey about their first set of discovery requests.	0.20	\$ 385.00/hr	\$77.00
08/05/2015	AZ	Spoke with Mr. Dillon about our strategy in responding to Defendants' first set of requests for production of documents and first set of interrogatories; drafted motion for partial summary judgment, specifically sections addressing whether due process rights were violated by Mr. Ericson's unrecorded meeting with Ms. Roe during her appeal, and by Mr. Ericson's previous involvement in the investigation of the disciplinary charges; searched for cases that help support arguments made in these sections.	6.10	\$ 245.00/hr	\$1,494.50
08/06/2015	AZ	Drafted motion for partial summary judgment, specifically sections addressing whether due process rights were violated by Mr. Ericson's unrecorded meeting with Ms. Roe during her appeal, and by Mr. Ericson's previous involvement in the investigation of the disciplinary charges; searched for cases that help support arguments made in these sections.	5.80	\$ 245.00/hr	\$1,421.00

08/06/2015	JD	Discussed settlement-related issues with David Drummey of GMU and [REDACTED], [REDACTED]'s attorney; spoke with emailed with [REDACTED] about [REDACTED]	0.60	\$ 385.00/hr	\$231.00
08/07/2015	AZ	Participated in telephone conversation with Defendants' counsel regarding possibility of settlement and factual issues relevant to our partial summary judgment motion; drafted motion for partial summary judgment, specifically section addressing whether Brent Ericson's prior involvement in case and exposure to previous disciplinary charges violated procedural due process rights; searched for cases that help support arguments made in that section.	3.50	\$ 245.00/hr	\$857.50
08/07/2015	JD	Discussed settlement-related issues with GMU attorneys and Adam Zurbruggen.	0.50	\$ 385.00/hr	\$192.50
08/10/2015	AZ	Reviewed documents in order to prepare objections to Defendants' interrogatories and requests for productions of documents; conducted legal research in order to determine what objections could be raised to Defendants' interrogatories and requests for productions of documents.	5.00	\$ 245.00/hr	\$1,225.00
08/11/2015	AZ	Reviewed documents in order to prepare objections to Defendants' interrogatories and requests for productions of documents; conducted legal research in order to determine what objections could be raised to Defendants' interrogatories and requests for productions of documents.	5.90	\$ 245.00/hr	\$1,445.50
08/12/2015	AZ	Reviewed documents in order to prepare objections to Defendants' interrogatories and requests for productions of documents; conducted legal research in order to determine what objections could be raised to Defendants' interrogatories and requests for productions of documents.	5.30	\$ 245.00/hr	\$1,298.50
08/13/2015	JD	Discussed discovery-related issues with Adam Zurbruggen; emailed with Brian Walther regarding the status of settlement negotiations.	0.20	\$ 385.00/hr	\$77.00
08/14/2015	AZ	Spoke with Rebecca LeGrand about information needed to respond to Defendants' requests for production of documents and interrogatories and our approach to obtaining information and preparing objections and responses; drafted email to [REDACTED] [REDACTED] [REDACTED]	2.00	\$ 245.00/hr	\$490.00
08/17/2015	RL	Reviewed draft objections to discovery requests, and discussed objections with Adam Zurbruggen.	0.40	\$ 385.00/hr	\$154.00
08/18/2015	JD	Reviewed and responded to emails from [REDACTED] and Adam Zurbruggen.	0.10	\$ 385.00/hr	\$38.50
08/19/2015	CM	Spoke with Adam Zurbruggen about [REDACTED] [REDACTED] [REDACTED]	0.30	\$ 325.00/hr	\$97.50
08/19/2015	AZ	Finalized objections to Defendants' interrogatories and document requests; spoke with Chris Muha and Rebecca LeGrand about objections.	2.00	\$ 245.00/hr	\$490.00
08/24/2015	JD	Reviewed our and GMU's objections to discovery; discussed case with Adam Zurbruggen; had two phone calls regarding settlement and related litigation issues with GMU attorneys and Mr. Zurbruggen; emailed [REDACTED] and [REDACTED] to set a time to update them on case.	1.50	\$ 385.00/hr	\$577.50
		Spoke with Mr. Dillon about discovery in preparation for call with			

08/24/2015	AZ	counsel for Defendants; participated in telephone conversation with counsel for Defendants regarding timeline for discovery and possibility of settlement; participated in follow up telephone conversation with counsel for Defendants regarding possibility of settlement.	1.00	\$ 245.00/hr	\$245.00
08/25/2015	AZ	Reviewed documents submitted by [REDACTED] and information submitted by [REDACTED] in order to prepare responses and consider specific objections to Defendants' First Set of Interrogatories and Requests for Production of Documents; began drafting responses to Defendants' First Set of Interrogatories.	2.80	\$ 245.00/hr	\$686.00
08/25/2015	JD	Discussed [REDACTED] with [REDACTED] and [REDACTED]; discussed [REDACTED] with GMU attorney's and [REDACTED]'s attorney.	1.10	\$ 385.00/hr	\$423.50
08/26/2015	AZ	Reviewed documents submitted by [REDACTED] and information submitted by [REDACTED] in order to prepare responses and consider specific objections to Defendants' First Set of Interrogatories and Requests for Production of Documents; continued drafting responses to Defendants' First Set of Interrogatories.	5.20	\$ 245.00/hr	\$1,274.00
08/26/2015	JD	Spoke with [REDACTED] about her latest discussions with [REDACTED].	0.20	\$ 385.00/hr	\$77.00
08/27/2015	AZ	Reviewed documents submitted by [REDACTED] and information submitted by [REDACTED] in order to prepare responses and consider specific objections to Defendants' First Set of Interrogatories and Requests for Production of Documents; continued drafting responses to Defendants' First Set of Interrogatories.	6.00	\$ 245.00/hr	\$1,470.00
08/28/2015	JD	Discussed [REDACTED] with [REDACTED]'s attorney; emailed and spoke with [REDACTED] and [REDACTED] about [REDACTED]; left voicemails for GMU attorneys.	0.30	\$ 385.00/hr	\$115.50
08/31/2015	AZ	Reviewed documents submitted by [REDACTED] and information submitted by [REDACTED] in order to prepare responses and consider specific objections to Defendants' First Set of Interrogatories and Requests for Production of Documents; drafted responses to Defendants' First Set of Document Requests; began organizing documents for production.	6.30	\$ 245.00/hr	\$1,543.50

Total Hours 76.30 hrs
Total Fees \$19,613.50**Total Invoice Amount** \$19,613.50**Previous Balance** \$0.00**Balance (Amount Due)** \$0.00**Payment History:**

Date	Type	Payment Description	Amount
9/1/2015	Payment - Trust Account		(\$19,613.50)

Trust Account Summary**Billing Period: 08/01/2015 - 09/01/2015****Project: General**

Total Deposits		Total Disbursements	Current Balance	
\$22,768.50		\$31,446.50	\$25,923.50	
Date	Transaction	Deposit	Disbursement	Balance
08/03/2015	Applied to invoice #21315		\$11,833.00	\$22,768.50
08/24/2015	Received From: [REDACTED]	\$22,768.50		\$45,537.00
09/01/2015	Applied to invoice #21360		\$19,613.50	\$25,923.50



1401 K Street NW
Suite 600
Washington DC, 20005
Phone: (202) 640-2850

Invoice 21315

Date	Aug 03, 2015
Service Thru	Jul 31, 2015

In Reference To: General (Fees)

Date	By	Services	Hours	Rates	Amount
07/01/2015	AZ	Continued assembling a chart listing elements of each cause of action and facts needed to support each in preparation for discovery; researched cases involving process due to student expelled for disciplinary misconduct; participated in call with client discussing hearing on Defendants' Motion to Dismiss and the discovery process.	5.40	\$ 245.00/hr	\$1,323.00
07/01/2015	JD	Discussed case, including discovery strategy and drafting of motion for partial summary judgment, with Adam Zurbriggen; discussed [REDACTED] with [REDACTED] and [REDACTED]	1.40	\$ 385.00/hr	\$539.00
07/06/2015	JD	Reviewed emails in preparation for meeting with, and met with, [REDACTED] to [REDACTED].	1.60	\$ 385.00/hr	\$616.00
07/07/2015	AZ	Drafted joint stipulation of material facts to be used by court in considering a motion for partial summary judgment on procedural due process and First Amendment claims.	6.00	\$ 245.00/hr	\$1,470.00
07/07/2015	JD	Discussed drafting of undisputed facts with Adam Zurbriggen.	0.10	\$ 385.00/hr	\$38.50
07/09/2015	JD	Prepared for and participated in discovery-conference phone call with Adam Zurbriggen and GMU attorneys.	1.20	\$ 385.00/hr	\$462.00
07/09/2015	AZ	Participated in telephone conversation with Mr. Dillon and counsel for the University to discuss how the process of discovery will be conducted in the case and the filing of a joint discovery plan with the Court.	0.00	\$ 245.00/hr	\$0.00
		NOTE: This work took .6 hours to complete, but you were not billed for it.			
07/13/2015	AZ	Reviewed Answer to Complaint filed by Defendants' counsel; spoke with Mr. Dillon about issues raised by the Answer; revised draft of joint stipulation of material facts.	3.00	\$ 245.00/hr	\$735.00
07/13/2015	JD	Spoke with Adam Zurbriggen about issues related to our proposed undisputed facts for the partial summary judgment motion; emailed [REDACTED] about [REDACTED]; reviewed emails between [REDACTED] and Mr. Zurbriggen about [REDACTED]	0.40	\$ 385.00/hr	\$154.00

07/13/2015	CM	Reviewed the draft discovery plan sent by Drummey, discussed it with Adam Zurbriggen, added one additional paragraph to it, and sent it to Justin Dillon for review.	0.30	\$ 325.00/hr \$97.50
07/14/2015	JD	Reviewed and edited GMU's draft joint discovery plan and emailed with GMU attorneys about same.	0.30	\$ 385.00/hr \$115.50
07/15/2015	JD	Discussed First Amendment claim for partial summary judgment and how to draft our document requests with Adam Zurbriggen; spoke with [REDACTED]'s attorney about her position on our settlement offer.	0.50	\$ 385.00/hr \$192.50
07/15/2015	AZ	Drafted a discovery request for production of documents by Defendants.	3.70	\$ 245.00/hr \$906.50
07/15/2015	CM	Corresponded with Justin Dillon and Adam Zurbriggen to make sure the joint discovery plan was being filed today as required. NOTE: This work took .1 hours to complete, but you were not billed for it.	0.00	\$ 325.00/hr \$0.00
07/16/2015	CM	Corresponded with Adam Zurbriggen about setting up calendar reminders for the major discovery deadlines. NOTE: This work took .1 hours to complete, but you were not billed for it.	0.00	\$ 325.00/hr \$0.00
07/17/2015	JD	Emailed and spoke with GMU attorneys about holding pretrial conference telephonically rather than in person to save time and money; at the court clerk's direction, drafted and filed motion requesting the same.	0.40	\$ 385.00/hr \$154.00
07/22/2015	JD	Spoke with [REDACTED] about status of settlement discussions with [REDACTED]; spoke and emailed with [REDACTED] about [REDACTED]; reviewed and edited draft stipulation of undisputed facts for partial summary judgment motion and discussed same with Adam Zurbriggen.	0.90	\$ 385.00/hr \$346.50
07/23/2015	JD	Reviewed and responded to email from [REDACTED] regarding [REDACTED].	0.10	\$ 385.00/hr \$38.50
07/23/2015	AZ	Reviewed e-mail correspondence between [REDACTED] and Mr. Ericson and between [REDACTED] and Mr. Ericson in order to garner additional facts for inclusion in joint stipulation of facts, in anticipation of filing a motion for partial summary judgment.	0.50	\$ 245.00/hr \$122.50
07/27/2015	JD	Revised joint stipulation of facts and sent it to GMU; discussed same and emailed about Initial Disclosures with Adam Zurbriggen; spoke with GMU attorneys about case.	0.50	\$ 385.00/hr \$192.50
07/28/2015	AZ	Reviewed documents in our possession in order to prepare initial disclosures to provide to opposing counsel in discovery; made notes on potential witnesses and documents to be disclosed as part of initial disclosures; spoke with Mr. Dillon and Rebecca LeGrand about the drafting of initial disclosures; began a draft of the initial disclosures.	3.90	\$ 245.00/hr \$955.50
07/29/2015	AZ	Completed draft of initial disclosures; researched the level of specificity needed for disclosures concerning the calculation of damages; spoke with Mr. Dillon about witnesses and documents to include in the initial disclosures.	3.10	\$ 245.00/hr \$759.50
07/29/2015	JD	Discussed draft of initial disclosures with Adam Zurbriggen.	0.20	\$ 385.00/hr \$77.00
07/30/2015	AZ	Drafted first set of interrogatories to be served on opposing counsel as part of the discovery process; revised requests for production of documents for consistency with the interrogatories; finalized both drafts for Mr. Dillon's review.	4.50	\$ 245.00/hr \$1,102.50

07/30/2015	JD	Reviewed, finalized, and sent initial disclosures to GMU; reviewed GMU's initial disclosures to us; reviewed our draft document requests and first set of interrogatories.	0.40	\$ 385.00/hr	\$154.00
07/31/2015	JD	Sent initial discovery requests to GMU; spoke with [REDACTED]'s attorney about the status of our settlement offer to her.	0.40	\$ 385.00/hr	\$154.00
07/31/2015	AZ	Researched law related to content-based restrictions on speech, in order to include in draft of motion for partial summary judgment on the First Amendment claim; drafted section of the motion for partial summary judgment addressing the First Amendment claim; reviewed research notes on procedures due to a student expelled for misconduct, in preparation of drafting section of partial summary judgment motion on procedural due process claims; began drafting section of partial summary judgment motion on procedural due process claims.	4.60	\$ 245.00/hr	\$1,127.00

Total Hours	43.40 hrs
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Total Fees	\$11,833.00
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Total Invoice Amount	\$11,833.00
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Previous Balance	\$0.00
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Balance (Amount Due)	\$0.00
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Payment History:

Date	Type	Payment Description	Amount
8/3/2015	Payment - Trust Account		(\$11,833.00)

Trust Account Summary**Billing Period: 07/01/2015 - 08/03/2015****Project: General**

Total Deposits		Total Disbursements	Current Balance	
\$34,601.50		\$12,231.50	\$22,768.50	
Date	Transaction	Deposit	Disbursement	Balance
07/01/2015	Applied to invoice #21278		\$398.50	\$0.00
07/01/2015	Received From- [REDACTED]	\$14,428.75		\$14,428.75
07/13/2015	Received From- [REDACTED]	\$20,172.75		\$34,601.50
08/03/2015	Applied to invoice #21315		\$11,833.00	\$22,768.50



1401 K Street NW
Suite 600
Washington DC, 20005
Phone: (202) 640-2850

Invoice 21278

Date Jul 01, 2015
Service Thru Jun 30, 2015

In Reference To: General (Fees)

Date	By	Services	Hours	Rates	Amount
06/02/2015	JD	Conducted legal research about whether Title IX requires a university to notify a non-student about a change in the outcome of a disciplinary proceeding; emailed David Drummey of GMU about same.	0.90	\$ 385.00/hr	\$346.50
06/03/2015	AZ	Researched law on issue of whether a student has a liberty interest implicated by a university's expulsion of the student for disciplinary misconduct; searched for cases where such an interest had been found; drafted introduction to supplemental brief requested by the Court in its consideration of the Defendants' Motion to Dismiss.	6.00	\$ 245.00/hr	\$1,470.00
06/04/2015	AZ	Drafted argument section of supplemental brief arguing that a student has a liberty interest implicated by a university's expulsion of the student for disciplinary misconduct; participated in telephone conversation with Mr. Dillon and counsel for Defendants discussing possibility for settlement and arguments that will be addressed in the supplemental brief on whether a student's liberty interest is implicated by a university's expulsion of a student for disciplinary misconduct.	3.00	\$ 245.00/hr	\$735.00
06/04/2015	JD	Discussed issues related to potential settlement with David Drummey, Brian Walther, and Adam Zurbriggen; spoke with Mr. Zurbriggen about arguments to make in our supplemental brief addressing whether there is a liberty interest in continued education.	1.60	\$ 385.00/hr	\$616.00
06/05/2015	AZ	Drafted argument section of supplemental brief arguing that a student has a liberty interest implicated by a university's expulsion of the student for disciplinary misconduct.	5.60	\$ 245.00/hr	\$1,372.00
06/07/2015	AZ	Drafted argument section of supplemental brief arguing that a student has a liberty interest implicated by a university's expulsion of the student for disciplinary misconduct.	3.00	\$ 245.00/hr	\$735.00
06/08/2015	AZ	Drafted argument section of supplemental brief arguing that a student has a liberty interest implicated by a university's expulsion of the student for disciplinary misconduct; participated in telephone conversation with Mr. Dillon and counsel for Defendants to discuss the possibility of settlement and timeline for exchanging drafts of	1.30	\$ 245.00/hr	\$318.50

		supplemental briefs.			
06/08/2015	JD	Discussed issues related to settlement with GMU attorneys; reviewed Adam Zurbriggen's draft of supplemental brief on liberty interest; emailed [REDACTED] and [REDACTED] to schedule time to talk about latest settlement discussions.	0.70	\$ 385.00/hr	\$269.50
06/09/2015	AZ	Searched for additional cases involving expulsion or suspension of student where a court explicitly found a liberty interest, for addition to supplemental brief on procedural due process claim.	1.50	\$ 245.00/hr	\$367.50
06/10/2015	JD	Spoke with David Drummey about progress of his liberty brief and rescheduling our call; discussed [REDACTED]	0.70	\$ 385.00/hr	\$269.50
06/10/2015	AZ	Participated in telephone conversation with [REDACTED] and [REDACTED] regarding [REDACTED]	0.50	\$ 245.00/hr	\$122.50
06/11/2015	AZ	Reviewed Defendants' supplemental brief regarding existence of liberty interest implicated by expulsion or suspension from a public university; read cases relied upon by Defendants in their supplemental brief; revised [REDACTED] supplemental brief to address these cases and add additional helpful cases found during earlier research.	4.80	\$ 245.00/hr	\$1,176.00
06/11/2015	JD	Reviewed GMU's draft liberty brief; discussed that and settlement issues with David Drummey and Brian Walther of GMU; conducted legal research on some of the cases cited in GMU's draft motion.	1.20	\$ 385.00/hr	\$462.00
06/14/2015	JD	Edited, finalized, and filed liberty brief.	0.60	\$ 385.00/hr	\$231.00
06/15/2015	JD	Reviewed today's Supreme Court decision dealing with procedural due process to see if it applies in our case.	0.20	\$ 385.00/hr	\$77.00
06/16/2015	AZ	Reviewed recent Supreme Court decision in Kerry v. Din on liberty interests in order to assess implications for argument that expulsion of a student implicates liberty interests; wrote email to Mr. Dillon explaining decision and discussing potential implications of the case in order to assess whether it was necessary to bring the case to the Court's attention, and in preparation for oral argument on the issue.	0.00	\$ 245.00/hr	\$0.00
		NOTE: This work took 2.3 hours to complete, but you were not charged for it.			
06/16/2015	JD	Reviewed GMU's liberty brief and emailed Adam Zurbriggen about following up and finding copies of the briefs filed in the Fourth Circuit's Jones case, to see if the parties raised the liberty-interest issue (which GMU suggests they may not have); reviewed Mr. Zurbriggen's analysis of yesterday's Supreme Court opinion dealing with procedural due process and instructed him to draft a letter informing the judge of the new case and our position on it.	0.20	\$ 385.00/hr	\$77.00
06/17/2015	AZ	Researched local rules to determine whether they provide a method of informing the Court of new case law authority, in order to determine how to bring Kerry v. Din to attention of the Court prior to oral argument on the existence of a liberty interest; called court clerk to discuss how this might be done; spoke with Mr. Dillon about the matter; spoke with legal librarian and contacted clerks of the Fourth Circuit and U.S. District Court for the Western District of North Carolina to determine how to obtain parties' briefs in 1983 decision in Jones v. Board of Governors, for use at oral argument; contacted National Archives to obtain those briefs.	1.00	\$ 245.00/hr	\$245.00
		NOTE: This work took 2.1 hours to complete, but you were charged for only 1 hour.			
		Participated in telephone conversation with Mr. Dillon and			

06/18/2015	AZ	Defendants' counsel regarding the possibility for settlement of the case, specifically discussing the possibility of complaining witness agreeing to be part of any settlement.	0.35	\$ 245.00/hr	\$85.75
06/18/2015	JD	Discussed settlement options with George Mason attorneys and Adam Zurbruggen.	0.50	\$ 385.00/hr	\$192.50
06/19/2015	AZ	Spoke with staff of National Archives about obtaining parties' briefs in Jones v. Board of Governors, in preparation for oral argument on existence of liberty interest; reviewed briefs in Jones case obtained from the Archives; sent email to Mr. Dillon discussing the implications of those briefs.	0.30	\$ 245.00/hr	\$73.50
06/23/2015	JD	Spoke with David Drummey of GMU about settlement-related issues; discussed same with [REDACTED] including whether they would be willing to reapproach [REDACTED]; spoke with [REDACTED]'s attorney about the same;	0.50	\$ 385.00/hr	\$192.50
06/24/2015	JD	Began preparing for motion to dismiss hearing by reviewing our pleadings, reading the relevant cases, and outlining our argument.	3.30	\$ 385.00/hr	\$1,270.50
06/25/2015	JD	Continued to review cases and outline argument for tomorrow's hearing on GMU's motion to dismiss; discussed related issues with Adam Zurbruggen.	4.40	\$ 385.00/hr	\$1,694.00
06/25/2015	AZ	Spoke with Mr. Dillon about cases and arguments in support of our position that student has a liberty interest implicated by expulsion, in preparation for oral argument on Defendants' Motion to Dismiss.	0.60	\$ 245.00/hr	\$147.00
06/26/2015	JD	Traveled to and from court to argue, and then argued, motion to dismiss; prepared for same by reviewing cases and argument outline and discussed possible questions and arguments with Adam Zurbruggen; discussed possible settlement options and related issues with GMU counsel David Drummey; emailed [REDACTED] and [REDACTED] to update them on how the argument went.	7.00	\$ 385.00/hr	\$2,695.00
		NOTE: This work took 9.5 hours to complete, but you were charged for only 7 hours.			
06/26/2015	AZ	Traveled to and from, and attended, hearing before district judge on University's Motion to Dismiss; discussed related legal issues with Mr. Dillon.	5.00	\$ 245.00/hr	\$1,225.00
		NOTE: This work took 7.8 hours to complete, but you were charged for only 5 hours.			
06/29/2015	CM	Spoke with Justin Dillon about working on the case, our plan for discovery and for drafting a partial summary judgment motion, and working with Adam Zurbruggen on organizing the discovery process; spoke with Adam Zurbruggen about creating an "order of proof" that identifies every point we need to prove to win on each claim, to guide our discovery planning.	0.70	\$ 325.00/hr	\$227.50
06/29/2015	AZ	Reviewed Federal Rules of Civil Procedure and local court rules on timeframe and process for conducting discovery; made notes on these rules; spoke with Mr. Dillon, Chris Muha, and Scott Bernstein about best methods for preparing for discovery in the case; reviewed scheduling order issued by the court; began assembling a chart listing elements of each cause of action and facts needed to support each element in preparation for discovery; reviewed complaint for facts to add to chart.	6.30	\$ 245.00/hr	\$1,543.50
06/29/2015	JD	Reviewed court's scheduling order and other court orders related to the hearing on our motion to dismiss; began researching and thinking about best and most efficient discovery procedures to use in the case; reviewed relevant EDVA local rules; discussed case with Adam Zurbruggen and Chris Muha.	1.90	\$ 385.00/hr	\$731.50

06/30/2015	AZ	Began drafting a proposed discovery order in preparation for conference with opposing counsel; assembled a chart listing elements of each cause of action and facts needed to support each element, in preparation for discovery; reviewed complaint for facts to add to chart; researched elements of Title IX claim for inclusion on chart.	5.60	\$ 245.00/hr	\$1,372.00
06/30/2015	JD	Began to create outline of discovery goals we need to accomplish; reviewed relevant federal and local rules.	0.60	\$ 385.00/hr	\$231.00

Total Hours	69.85 hrs
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Total Fees	\$20,571.25
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Total Invoice Amount	\$20,571.25
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Previous Balance	\$0.00
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Balance (Amount Due)	\$0.00
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Payment History:

Date	Type	Payment Description	Amount
7/1/2015	Payment - Trust Account		(\$398.50)
7/1/2015	Payment - Check		(\$20,172.75)

Trust Account Summary**Billing Period: 06/01/2015 - 07/01/2015****Project: General****Total Deposits**

\$14,428.75

Total Disbursements

\$35,000.00

Current Balance

\$14,428.75

Date	Transaction	Deposit	Disbursement	Balance
06/01/2015	Applied to invoice #21238		\$34,601.50	\$398.50
07/01/2015	Applied to invoice #21278		\$398.50	\$0.00
07/01/2015	Received From: [REDACTED]	\$14,428.75		\$14,428.75



1401 K Street NW
Suite 600
Washington DC, 20005
Phone: (202) 640-2850

Invoice 21238

Date Jun 01, 2015
Service Thru May 31, 2015

In Reference To: General (Fees)

Date	By	Services	Hours	Rates	Amount
05/01/2015	AZ	Reviewed Federal Rules of Civil Procedure and local rules regarding on the issue of whether a plaintiff can move for partial summary judgment while a defendant's motion to dismiss is pending, in anticipation of filing a partial summary judgment motion; reviewed cases where summary judgment had been obtained or denied while a motion to dismiss was pending.	0.80	\$ 245.00/hr	\$196.00
05/04/2015	AZ	Reviewed Second Amended Complaint for claims needing little or no discovery; made notes on whether such claims should be included in a motion for partial summary judgment, focusing on a lack of need for discovery and the chance of success on the claim; researched local rules related to whether multiple summary judgment motions can be filed as to a single claim; discussed these issues with Mr. Dillon.	1.60	\$ 245.00/hr	\$392.00
05/04/2015	JD	Spoke with Adam Zurbriggen regarding counts on which to file a motion for partial summary judgment.	0.30	\$ 385.00/hr	\$115.50
05/06/2015	AZ	Researched law related to procedural due process claims, focusing particularly on cases where summary reversal of a panel finding was found to violate due process, in anticipation of filing partial summary judgment motion and responding to a motion to dismiss; reviewed University's Motion to Dismiss; made notes on issues raised by motion which require additional legal research.	6.90	\$ 245.00/hr	\$1,690.50
05/07/2015	AZ	Researched law related to procedural and substantive due process claims, focusing particularly on the property interests in continued education and potential employment and liberty interest in reputation, in order to respond to University's Motion to Dismiss; reviewed cases cited by University on the issue of protected property and liberty interests; reviewed cases addressing how claims are brought directly under the Virginia Constitution; made notes on these issues.	3.60	\$ 245.00/hr	\$882.00
05/08/2015	AZ	Researched law related to procedural and substantive due process claims, focusing particularly on the property interests in continued education and potential employment and liberty interest in reputation, in order to respond to University's Motion to Dismiss; researched law related to First Amendment protection of speech	8.20	\$ 245.00/hr	\$2,009.00

made in school setting and statements alleged to be threats or harassment; researched Virginia law related to negligence claims and claims made under negligence per se theory; made notes on these issues.

05/08/2015	JD	Discussed response to motion to dismiss with Adam Zurbriggen.	0.20	\$ 385.00/hr	\$77.00
05/11/2015	AZ	Researched law related to First Amendment protection of speech made in school setting and statements alleged to be threats or harassment; researched law related to pleading of Title IX and Equal Protection Clause claims, focusing on cases finding inference of discriminatory intent; made notes on these issues in preparation of drafting brief in opposition to University's Motion to Dismiss.	3.80	\$ 245.00/hr	\$931.00
05/11/2015	JD	Reviewed George Mason's motion to dismiss and discussed same with Adam Zurbriggen.	0.60	\$ 385.00/hr	\$231.00
05/12/2015	AZ	Researched law related to First Amendment protection of speech made in school setting and statements alleged to be threats or harassment; researched law related to pleading of Title IX and Equal Protection Clause claims, focusing on cases finding inference of discriminatory intent; made notes on these issues in preparation of drafting brief in response to University's Motion to Dismiss.	6.80	\$ 245.00/hr	\$1,666.00
05/13/2015	AZ	Drafted Brief in Response to Defendants' Motion to Dismiss.	14.80	\$ 245.00/hr	\$3,626.00
05/14/2015	AZ	Drafted Brief in Response to Defendants' Motion to Dismiss.	11.60	\$ 245.00/hr	\$2,842.00
05/14/2015	JD	Discussed legal issues surrounding response to motion to dismiss with Adam Zurbriggen and Chris Muha.	0.40	\$ 385.00/hr	\$154.00
05/15/2015	AZ	Drafted Brief in Response to Defendants' Motion to Dismiss.	8.50	\$ 245.00/hr	\$2,082.50
05/15/2015	CM	Revised and edited Adam Zurbriggen's draft of our opposition to the motion to dismiss.	2.70	\$ 325.00/hr	\$877.50
05/16/2015	CM	Revised and edited Adam Zurbriggen's draft of our opposition to the motion to dismiss.	2.40	\$ 325.00/hr	\$780.00
05/16/2015	AZ	Made revisions to Brief in Response to Defendants' Motion to Dismiss, based on changes suggested by Mr. Muha.	5.40	\$ 245.00/hr	\$1,323.00
05/16/2015	JD	Reviewed and edited Adam Zurbriggen's draft of our response to George Mason's motion to dismiss and emailed him about same.	2.00	\$ 385.00/hr	\$770.00
05/17/2015	AZ	Made revisions to Brief in Response to Defendants' Motion to Dismiss based on changes suggested by Mr. Dillon; reviewed and finalized Brief for filing.	2.50	\$ 245.00/hr	\$612.50
05/17/2015	JD	Reviewed and edited Adam Zurbriggen's second draft of our response to the motion to dismiss and emailed him about it.	0.50	\$ 385.00/hr	\$192.50
05/18/2015	JD	Filed response to motion to dismiss; emailed with Adam Zurbriggen and Chris Muha about motion for partial summary judgment and performed related research.	0.50	\$ 385.00/hr	\$192.50
05/18/2015	AZ	Began drafting Motion for Partial Summary Judgment on procedural due process and First Amendment claims; began drafting statement of material facts for inclusion in the Motion; researched how First Amendment claims are analyzed under the summary judgment standard; emailed Mr. Dillon about the timeline for briefing of the Motion under the court's local rules.	3.30	\$ 245.00/hr	\$808.50
		Spoke with Adam Zurbriggen about calling David Drummey regarding whether they would consent to a motion continuing Friday's hearing on our procedural due process and First Amendment claims until after the summary judgment briefing is filed, since we'll cover a lot of those same issues on summary judgment; participated on that call with David Drummey; spoke			

05/19/2015	CM	with Adam Zurbriggen and Rebecca LeGrand about whether we can file a motion for partial summary judgment in this specific court and about drafting a motion for leave file such a motion; emailed Justin Dillon explaining why we wouldn't be filing the motion for a continuance today and why we were instead drafting a motion for leave to file for partial summary judgment; reviewed Adam Zurbriggen's motion for leave to file a partial motion for summary judgment.	1.10	\$ 325.00/hr	\$357.50
05/19/2015	JD	Reviewed and responded to emails from Adam Zurbriggen and Chris Muha regarding our motion for leave to file partial summary judgment.	0.20	\$ 385.00/hr	\$77.00
05/19/2015	AZ	Called Judge's Chambers and spoke with law clerk about filing of partial summary judgment motion and how the Court could be notified of the motion for purposes of consolidating hearing with Defendants' Motion to Dismiss; emailed Mr. Dillon about the matter; called and spoke with opposing counsel about continuing the hearing on the Motion to Dismiss until after briefing on the partial summary judgment motion; spoke Mr. Muha and Ms. LeGrand about the matter; drafted and filed a Motion for Leave to File Motion for Partial Summary Judgment.	2.90	\$ 245.00/hr	\$710.50
05/20/2015	JD	Began reviewing cases and creating outline in preparation for Motion to Dismiss hearing.	1.80	\$ 385.00/hr	\$693.00
05/21/2015	CM	Spoke with Justin Dillon about issues he's likely to be asked at oral argument tomorrow on our Title IX and substantive due process claims; reviewed the university's motion to dismiss and its reply brief to formulate questions to ask Justin Dillon as he prepares for argument tomorrow; spoke with Justin Dillon about questions I thought he might get asked and potential weak points in our arguments.	1.20	\$ 325.00/hr	\$390.00
05/21/2015	AZ	Reviewed Defendants' Brief Replying to Mr. [REDACTED]'s Brief in Response to Defendants' Motion to Dismiss; reviewed cases cited for the first time in the Reply Brief, including cases on state sovereign immunity in negligence claims, and cases involving liberty interests under the Due Process Clause; conducted additional research on First Amendment claim in response to questions raised by Mr. Dillon about allegedly valueless speech; composed case summaries for Mr. Dillon to assist him in preparation for oral argument on Motion to Dismiss; discussed issues with Mr. Dillon to assist him in preparing for argument.	8.70	\$ 245.00/hr	\$2,131.50
05/21/2015	JD	Prepared for tomorrow's motion to dismiss hearing by reviewing pleadings and cases and creating outline for argument; discussed same with Chris Muha and Adam Zurbriggen.	6.90	\$ 385.00/hr	\$2,656.50
05/22/2015	AZ	Traveled to United States Courthouse in Alexandria, Virginia for hearing on Motion to Dismiss; attended hearing on Motion; participated in discussions with opposing counsel about possible settlement of the case.	6.50	\$ 245.00/hr	\$1,592.50
		Note: You were not billed for Mr. Zurbriggen's 1.3 hours of travel time to and from the courthouse.			
05/22/2015	JD	Prepared for and participated in hearing on motion to dismiss; discussed same with Adam Zurbriggen; met with counsel for GMU to discuss judge's admonition regarding settlement possibilities; traveled to and from courthouse.	6.50	\$ 385.00/hr	\$2,502.50
05/26/2015	JD	Spoke with Adam Zurbriggen about how to structure our supplemental brief on whether there is a liberty interest in one's continued education at a public school.	0.30	\$ 385.00/hr	\$115.50
		Prepared for meeting with, and met with, [REDACTED] and [REDACTED]			

05/27/2015	JD	[REDACTED] to [REDACTED].	1.60	\$ 385.00/hr	\$616.00
05/29/2015	JD	Spoke with David Drummey about issues related to settlement, including GMU's inability to agree to binding mediation because it is a government agency.	0.80	\$ 385.00/hr	\$308.00

Total Hours	125.90 hrs
Total Fees	\$34,601.50
Total Invoice Amount	\$34,601.50
Previous Balance	\$0.00
Balance (Amount Due)	\$0.00

Payment History:

Date	Type	Payment Description	Amount
6/1/2015	Payment - Trust Account		(\$34,601.50)

Trust Account Summary**Billing Period: 05/01/2015 - 06/01/2015****Project: General****Total Deposits**

\$5,654.00

Total Disbursements

\$40,255.50

Current Balance

\$398.50

Date	Transaction	Deposit	Disbursement	Balance
05/01/2015	Applied to invoice #21203		\$5,654.00	\$29,346.00
05/15/2015	Received From- [REDACTED]	\$5,654.00		\$35,000.00
06/01/2015	Applied to invoice #21238		\$34,601.50	\$398.50



1401 K Street NW
Suite 600
Washington DC, 20005
Phone: (202) 640-2850

Invoice 21203

Date May 01, 2015
Service Thru Apr 30, 2015

In Reference To: General (Fees)

Date	By	Services	Hours	Rates	Amount
04/02/2015	JD	Reviewed all cases cited in briefing on John Doe matter and outlined argument in preparation for tomorrow's hearing.	6.60	\$ 385.00/hr	\$2,541.00
04/03/2015	JD	Traveled to and from court and participated in hearing on whether [REDACTED] should be permitted to proceed as a John Doe.	5.00	\$ 385.00/hr	\$1,925.00
04/06/2015	JD	Reviewed court orders regarding amended complaint and scheduling dates; discussed changes to amended complaint with Adam Zurbruggen.	0.20	\$ 385.00/hr	\$77.00
04/07/2015	JD	Finalized and filed second amended complaint; emailed with [REDACTED] and [REDACTED] about [REDACTED]	0.30	\$ 385.00/hr	\$115.50
04/08/2015	JD	Participated in conference call about John Doe issue and options moving forward with [REDACTED] and [REDACTED]	0.80	\$ 385.00/hr	\$308.00
04/14/2015	MK	Exchange email with [REDACTED] mother about a GMU administrative problem; email GMU's General Counsel about the issue.	0.30	\$ 445.00/hr	\$133.50
04/29/2015	AZ	Reviewed Federal Rules of Civil Procedure and local rules regarding whether a plaintiff can move for partial summary judgment while a defendant's motion to dismiss is pending, in anticipation of filing a partial summary judgment motion.	1.60	\$ 245.00/hr	\$392.00

In Reference To: General (Expenses)

Date	By	Expenses	Amount
04/01/2015	MK	Best Messenger	\$162.00

Total Hours	14.80 hrs
Total Fees	\$5,492.00
Total Expenses	\$162.00
Total Invoice Amount	\$5,654.00
Previous Balance	\$0.00
Balance (Amount Due)	\$0.00

Payment History:

Date	Type	Payment Description	Amount
5/1/2015	Payment - Trust Account		(\$5,654.00)

Trust Account Summary**Billing Period: 03/01/2015 - 05/01/2015****Project: General****Total Deposits**

\$25,937.50

Total Disbursements

\$31,591.50

Current Balance

\$29,346.00

Date	Transaction	Deposit	Disbursement	Balance
03/02/2015	Applied to invoice #21130		\$9,666.00	\$25,334.00
03/12/2015	Received From- [REDACTED]	\$9,666.00		\$35,000.00
04/01/2015	Applied to invoice #21182		\$16,271.50	\$18,728.50
04/22/2015	Received From- [REDACTED]	\$16,271.50		\$35,000.00
05/01/2015	Applied to invoice #21203		\$5,654.00	\$29,346.00



1401 K Street NW
Suite 600
Washington DC, 20005
Phone: (202) 640-2850

Invoice 21182

Date Apr 01, 2015
Service Thru Mar 31, 2015

In Reference To: General (Fees)

Date	By	Services	Hours	Rates	Amount
03/08/2015	AL	Determined the statutory deadline for GMU to return the waivers of service we sent shortly after the lawsuit was filed.	0.10	\$ 245.00/hr	\$24.50
03/11/2015	AL	Reviewed George Mason's objections to the magistrate judge's order granting our motion to proceed under a pseudonym; downloaded the cases cited by George Mason.	0.70	\$ 245.00/hr	\$171.50
03/16/2015	AL	Drafted a response to GMU's objections to the John Doe motion explaining why the magistrate judge properly granted our motion and expounded upon the harm [REDACTED] and [REDACTED] would face if required to proceed under their real names.	6.40	\$ 245.00/hr	\$1,568.00
03/16/2015	MK	Reviewed George Mason's objection to the motion to proceed as a John Doe matter.	0.40	\$ 445.00/hr	\$178.00
03/17/2015	AL	Researched Virginia FOIA statutes and case law to determine if we would have any way to stop the Virginia Attorney General's Office from disclosing our notice of claim filed pursuant to the Virginia Tort Claims Act; continued drafting our reply brief to GMU's Objections to the John Doe motion.	5.80	\$ 245.00/hr	\$1,421.00
03/17/2015	AZ	Researched whether federal court has power to issue a protective order preventing disclosure of client's name. Issue is relevant in drafting response to University's claim, in its objections to the order permitting anonymity, that the notice of claim filed with the Virginia attorney general is disclosable under Virginia's Freedom of Information Act.	5.20	\$ 245.00/hr	\$1,274.00
03/18/2015	AL	Added a section to the brief describing the standard GMU must meet to allow the district judge to overrule the magistrate's decision to grant our motion to proceed under a pseudonym and for protective order; sent the updated draft to Mr. Kaiser for review.	1.70	\$ 245.00/hr	\$416.50
03/18/2015	AZ	Reviewed response to objections to proceed under pseudonym; discussed revisions with Ms. Lansell; reviewed complaint and preliminary injunction in case in anticipation of assisting on response to a motion to dismiss.	0.00	\$ 245.00/hr	\$0.00

NOTE: THIS WORK TOOK 2.5 HOURS TO COMPLETE, BUT YOU ARE NOT BEING BILLED FOR IT.

Downloaded cases cited by GMU so Mr. Dillon could be up-to-date on the case and the John Doe motion; talked with Mr. Dillon about the claims we brought and the potential addition of first amendment claims; discussed amending the complaint to add new claims.				
03/19/2015	AL		1.50	\$ 245.00/hr \$367.50
03/19/2015	JD	Reviewed and edited Allison Lansell's draft of John Doe motion and discussed edits with her.	1.20	\$ 385.00/hr \$462.00
03/19/2015	AZ	Researched law for reply to University's objections to motion to proceed anonymously, specifically searching for campus sexual assault cases where plaintiff was allowed to proceed anonymously and more generally for cases where plaintiff was allowed to proceed anonymously due to an unusual or potentially stigmatizing sexual practice; spoke with Mr. Dillon about amending complaint to add additional First Amendment and Substantive Due Process claims.	4.20	\$ 245.00/hr \$1,029.00
03/20/2015	AZ	Researched law related to hostile educational environment claims and substantive due process rights in anticipation of drafting second amended complaint adding claims; researched law related to seeking court's permission to amend complaint and local rules applicable to amending complaint.	5.10	\$ 245.00/hr \$1,249.50
03/20/2015	AL	Incorporated Mr. Dillon's edits to the reply brief, including additional case law from Mr. Zurbriggen supporting our contention that proceeding under a pseudonym is appropriate in cases like this; re-read our reply brief and added more detail about [REDACTED] and [REDACTED]'s relationship to allow the judge to see that the facts of this case are highly sensitive in nature.	4.20	\$ 245.00/hr \$1,029.00
03/23/2015	AZ	Finished drafting second amended complaint and motion for leave to amend complaint; incorporated research on protective orders and Virginia Freedom of Information Act into response to University's objections to anonymity.	8.00	\$ 245.00/hr \$1,960.00
NOTE: THIS WORK TOOK 11.7 HOURS TO COMPLETE, BUT YOU ARE BEING BILLED FOR ONLY 8 HOURS.				
03/23/2015	JD	Reviewed, edited, and filed opposition to George Mason's motion to strike our John Doe status; discussed same with Allison Lansell via phone and email; emailed and spoke with Adam Zurbriggen about drafting footnote attacking George Mason's FOIA argument; conducted legal research relevant to our response.	4.40	\$ 385.00/hr \$1,694.00
03/23/2015	AL	Drafted Mr. Dillon's notice of appearance; incorporated edits from Mr. Dillon and proofread the draft of our reply to GMU's objections; researched each of the factors courts will consider when determining if they should grant leave to amend a complaint to add further claims; sent research notes to Mr. Zurbriggen to use in drafting the motion for leave to amend.	3.00	\$ 245.00/hr \$735.00
03/23/2015	CM	Spoke with A. Zurbriggen about the strategy we use to determine the amount of factual detail to include under each "count" in our campus sexual misconduct complaints.	0.10	\$ 325.00/hr \$32.50
03/24/2015	JD	Reviewed and edited second amended complaint, motion for leave to amend, and memorandum of law in support of that motion; discussed same with Adam Zurbriggen; emailed with [REDACTED] and [REDACTED] about same.	2.10	\$ 385.00/hr \$808.50
03/24/2015	AZ	Spoke to Mr. Dillon about revisions to proposed Second Amended Complaint adding new claims, as well as Motion for Leave to Amend Complaint to add the claims; made revisions to draft of both.	0.80	\$ 245.00/hr \$196.00
03/24/2015	CM	Reviewed and edited the "counts" sections of the Second Amended Complaint, checking in particular to see whether we	0.30	\$ 325.00/hr \$97.50

strike the right balance of factual assertion and legal argumentation.

03/25/2015	JD	Discussed amended complaint with GMU attorney David Drummey; finalized revisions to draft of second amended complaint and sent it to Mr. Drummey; discussed case with Adam Zurbriggen.	0.60	\$ 385.00/hr	\$231.00
03/25/2015	AZ	Made revisions to Proposed Second Amended Complaint adding additional claims and motion for leave to amend the complaint; spoke with Mr. Dillon about the revisions.	0.60	\$ 245.00/hr	\$147.00
03/26/2015	JD	Emailed with and left voicemail for David Drummey regarding status of consent to our amended complaint.	0.20	\$ 385.00/hr	\$77.00
03/27/2015	AL	Called the Fairfax County General District Court to determine the process for obtaining copies of the exhibits entered during the protective order hearing; sent a messenger to get the exhibits.	1.00	\$ 245.00/hr	\$245.00
03/27/2015	AZ	Reviewed and finalized Proposed Second Amended Complaint and Motion for Leave to Amend Complaint for filing with Court; spoke with Mr. Dillon about revisions	1.80	\$ 245.00/hr	\$441.00
03/30/2015	AL	Called [REDACTED] to see if she had copies of the exhibits from the protective order or, alternatively, if she could get copies from the court since we were unable to last week because the case is sealed.	0.10	\$ 245.00/hr	\$24.50
03/30/2015	JD	Finalized and filed motion to amend complaint; discussed same with Adam Zurbriggen and George Mason's attorneys.	0.70	\$ 385.00/hr	\$269.50
03/31/2015	AL	Called [REDACTED] to check in about getting copies of the Protective Order exhibits; saved the new exhibits and alerted Mr. Dillon about their existence.	0.50	\$ 245.00/hr	\$122.50

Total Hours 60.70 hrs

Total Fees \$16,271.50

Total Invoice Amount \$16,271.50

Previous Balance \$0.00

Balance (Amount Due) \$0.00

Payment History:

Date	Type	Payment Description	Amount
4/1/2015	Payment - Trust Account		(\$16,271.50)

Trust Account Summary**Billing Period: 03/01/2015 - 04/01/2015****Project: General****Total Deposits**

\$9,666.00

Total Disbursements

\$25,937.50

Current Balance

\$18,728.50

Date	Transaction	Deposit	Disbursement	Balance
03/02/2015	Applied to invoice #21130		\$9,666.00	\$25,334.00
03/12/2015	Received From- [REDACTED]	\$9,666.00		\$35,000.00
04/01/2015	Applied to invoice #21182		\$16,271.50	\$18,728.50



1401 K Street NW
Suite 600
Washington DC, 20005
Phone: (202) 640-2850

Invoice 21130

Date Mar 02, 2015
Service Thru Feb 28, 2015

In Reference To: General (Fees)

Date	By	Services	Hours	Rates	Amount
02/02/2015	MK	Speak with [REDACTED] and [REDACTED] about [REDACTED]; speak with Allison Lansell throughout the day about filing logistics.	0.60	\$ 445.00/hr	\$267.00
02/02/2015	AL	Prepared the summons for George Mason, Mr. Ericson, and Ms. Blank-Godlove; determined proper service addresses for Mr. Ericson and Ms. Blank-Goldove and the appropriate person to serve on behalf of George Mason; edited the complaint to clearly bring claims against Mr. Ericson and Ms. Blank-Godlove in their official capacities.	6.90	\$ 245.00/hr	\$1,690.50
02/03/2015	AL	Called [REDACTED] to relay the new offer; emailed [REDACTED] and [REDACTED] to [REDACTED]	0.40	\$ 245.00/hr	\$98.00
02/05/2015	AL	Called [REDACTED] to see if [REDACTED] had considered [REDACTED] offer; Emailed [REDACTED] to tell him [REDACTED] asked for time to think about the offer.	0.10	\$ 245.00/hr	\$24.50
02/09/2015	AL	Called [REDACTED] to determine if [REDACTED] had made a decision on [REDACTED] latest settlement offer.	0.10	\$ 245.00/hr	\$24.50
02/10/2015	AL	Spoke to [REDACTED] about [REDACTED] denying our settlement offer and asking to settle civil suits just between [REDACTED] and [REDACTED] emailed Mr. Kaiser to relay that conversation and discuss next steps; emailed [REDACTED] and [REDACTED] to [REDACTED]	4.90	\$ 245.00/hr	\$1,200.50
02/11/2015	AL	Spoke with [REDACTED] and [REDACTED] about [REDACTED]	0.50	\$ 245.00/hr	\$122.50
02/11/2015	MK	Speak with [REDACTED] and [REDACTED] about [REDACTED]	0.50	\$ 445.00/hr	\$222.50
02/12/2015	MK	Review and revise the motion to proceed as a John Doe action.	0.40	\$ 445.00/hr	\$178.00
02/14/2015	AL	Incorporated Mr. Kaiser's edits into the Motion for Leave to Proceed Under Pseudonym.	0.20	\$ 245.00/hr	\$49.00

Updated and printed final copies of all documents for filing in the

02/16/2015	AL	Eastern District of Virginia.	1.50	\$ 245.00/hr	\$367.50
02/18/2015	AL	Added the Board of Visitors to the Complaint and edited the Complaint accordingly; read the complaint to eliminate any details that could possibly lead to the identification of [REDACTED] or [REDACTED]; filed the Complaint and Motion for Leave to Proceed Under Pseudonym; prepared the notice of hearing.	5.10	\$ 245.00/hr	\$1,249.50
02/18/2015	MK	Perform a final review of the complaint and motion to proceed under a pseudonym before filing; communicate with Allison Lansell about filing details; exchange email with counsel for George Mason about service of process and scheduling a hearing with the Court.	3.10	\$ 445.00/hr	\$1,379.50
02/19/2015	AL	Prepared the waivers of service for George Mason, the Board of Visitors, Mr. Ericson, and Ms. Blank-Godlove; sent all documents required under Rule 4 of the Federal Rules of Civil Procedure to Mr. Drummey to properly obtain waiver of service.	1.90	\$ 245.00/hr	\$465.50
02/19/2015	MK	Exchange email with opposing counsel about briefing the motion to file as John Doe.	0.20	\$ 445.00/hr	\$89.00
02/23/2015	AL	Determined the deadlines for Mr. Drummey to file a response to our Motion for Leave to Proceed Under Pseudonym and for our reply brief; Determined the deadline for filing a notice for the hearing on that motion; filed a pro hac vice motion for Mr. Kaiser.	0.80	\$ 245.00/hr	\$196.00
02/23/2015	MK	Exchange emails throughout the day with opposing counsel about scheduling and the John Doe motion; draft an email updating [REDACTED] and [REDACTED] about the case.	0.40	\$ 445.00/hr	\$178.00
02/24/2015	MK	Read the order granting our John Doe motion and email [REDACTED] and [REDACTED] about it.	0.30	\$ 445.00/hr	\$133.50
02/25/2015	AL	Amended the complaint to name The Rectors and Visitors of George Mason University as the proper corporate entity for the lawsuit and added President Angel Cabrera as a party in his official capacity.	0.90	\$ 245.00/hr	\$220.50
02/26/2015	AL	Prepared the amended complaint for filing and service; electronically filed the amended complaint and compiled the appropriate documents for proper service (or waiver of service) for the two new parties named-- The Rector and Visitors of George Mason University and President Angel Cabrera; send a courier to get the summonses from the Eastern District of Virginia.	2.30	\$ 245.00/hr	\$563.50
02/26/2015	MK	Exchange email with counsel for GMU; review an amended complaint changing the way George Mason is referred to and adding the President of the school as a defendant; email [REDACTED] and his mother.	0.60	\$ 445.00/hr	\$267.00
02/27/2015	MK	Exchange email with counsel for GMU about our lawsuit and whether the President of George Mason will accept service.	0.30	\$ 445.00/hr	\$133.50

In Reference To: General (Expenses)

Date	By	Expenses	Amount
02/18/2015	MK	Filing Fee	\$400.00
02/24/2015	AL	Filing Motion Fee	\$75.00
02/26/2015	MK	Best Messenger	\$71.00
Total Hours			32.00 hrs
Total Fees			\$9,120.00
Total Expenses			\$546.00

4/21/2016	https://secure.bill4time.com/B4T2/Invoicing/printInvoices2.aspx		
		Total Invoice Amount	\$9,666.00
		Previous Balance	\$0.00
		Balance (Amount Due)	\$0.00

Payment History:

Date	Type	Payment Description	Amount
3/2/2015	Payment - Trust Account		(\$9,666.00)

Trust Account Summary**Billing Period: 01/31/2015 - 03/02/2015****Project: General****Total Deposits**

\$30,970.50

Total Disbursements

\$25,636.50

Current Balance

\$25,334.00

Date	Transaction	Deposit	Disbursement	Balance
01/31/2015	Applied to invoice #21094		\$15,970.50	\$4,029.50
02/12/2015	Received From- [REDACTED]	\$15,000.00		\$19,029.50
02/16/2015	Received From- [REDACTED]	\$15,970.50		\$35,000.00
03/02/2015	Applied to invoice #21130		\$9,666.00	\$25,334.00



1401 K Street NW
Suite 600
Washington DC, 20005
Phone: (202) 640-2850

Invoice 21094

Date Jan 31, 2015
Service Thru Jan 31, 2015

In Reference To: General (Fees)

Date	By	Services	Hours	Rates	Amount
01/02/2015	AL	Organized and added exhibits to the preliminary injunction; added citations to the exhibits throughout the preliminary injunction; proofread the complaint and preliminary injunction.	3.90	\$ 245.00/hr	\$955.50
01/02/2015	MK	Review and revise the draft motion for a preliminary injunction in a possible suit against George Mason.	3.20	\$ 445.00/hr	\$1,424.00
01/03/2015	MK	Revise and finalize for distribution to the school's general counsel the motion for a preliminary injunction and complaint; draft a cover email to the school for these documents.	1.90	\$ 445.00/hr	\$845.50
01/05/2015	AL	Determined the Eastern District of Virginia rules for filing a preliminary injunction; determined the add-drop deadlines for George Mason University; researched the standard for requesting leave to proceed under a pseudonym; drafted [REDACTED]'s affidavit in support of the preliminary injunction.	8.20	\$ 245.00/hr	\$2,009.00
01/07/2015	MK	Speak with counsel for George Mason at length about the case and settlement prospects; exchange email with [REDACTED] and his family about [REDACTED].	1.10	\$ 445.00/hr	\$489.50
01/08/2015	AL	Emailed [REDACTED] the affidavit to check for accuracy; made a filing checklist listing everything that must be completed over the weekend if we do decide to file on Monday; drafted notice under 8.01-195.6	3.40	\$ 245.00/hr	\$833.00
01/08/2015	MK	Speak with [REDACTED] about [REDACTED]; exchange email about [REDACTED]'s criminal case and preparing to file suit if necessary.	0.60	\$ 445.00/hr	\$267.00
01/09/2015	AL	Prepared for the potential filing by updating [REDACTED]'s affidavit pursuant to [REDACTED]'s feedback and began drafting the motion to proceed under pseudonym; spoke to [REDACTED] and [REDACTED] about [REDACTED].	5.20	\$ 245.00/hr	\$1,274.00
01/09/2015	MK	Speak with counsel for George Mason University at length about the prospects of resolving the case at different points throughout the day; speak with [REDACTED] and his mother; email updates to [REDACTED].	2.40	\$ 445.00/hr	\$1,068.00

01/12/2015	AL	Revised and sent the notice to the Virginia Attorney General to ensure that it described each potential claim [REDACTED] has against George Mason, Ms. Blank-Godlove, and Mr. Ericson; spoke to [REDACTED] about contacting [REDACTED].	6.20	\$ 245.00/hr	\$1,519.00
01/12/2015	MK	Speak with counsel for [REDACTED] in the CPO; exchange email throughout the day with counsel for GMU and [REDACTED] family; review the notice to the Virginia Attorney General.	1.10	\$ 445.00/hr	\$489.50
01/13/2015	AL	Added a negligence per se claim to the complaint.	1.20	\$ 245.00/hr	\$294.00
01/13/2015	MK	Exchange email with counsel for George Mason; discuss getting language to counsel for [REDACTED] to facilitate a settlement with Allison Lansell.	0.40	\$ 445.00/hr	\$178.00
01/14/2015	AL	Research case law on filing under a pseudonym to determine what weight courts give each factor including where the person who desires to use a pseudonym has already been publicly identified in a collateral proceeding by his real name; researched whether the court might order [REDACTED] to appear under his real name while allowing [REDACTED] to remain anonymous.	6.40	\$ 245.00/hr	\$1,568.00
01/14/2015	MK	Speak with counsel at GMU; speak with the lawyer for [REDACTED] about the possibility of a settlement; speak with [REDACTED] mother about [REDACTED]; discuss next steps with Allison Lansell.	1.40	\$ 445.00/hr	\$623.00
01/15/2015	AL	Updated the Motion to Proceed Under a Pseudonym to properly address the factors courts consider when determining such motions.	2.90	\$ 245.00/hr	\$710.50
01/15/2015	MK	Review a summary of lawsuits against George Mason compiled by Allison Lansell and email [REDACTED] mother about it.	0.30	\$ 445.00/hr	\$133.50
01/26/2015	MK	Speak with counsel for the complaining witness about whether she will agree to a settlement.	0.20	\$ 445.00/hr	\$89.00
01/29/2015	AL	Determined the applicability of ex parte Young to [REDACTED] claims alleged against University administrators and whether they will be protected by sovereign immunity.	4.00	\$ 245.00/hr	\$980.00
01/30/2015	AL	Left a voicemail for [REDACTED] asking to discuss [REDACTED] decision; continued researching Virginia case law interpreting and applying ex parte Young.	0.90	\$ 245.00/hr	\$220.50

Total Hours 54.90 hrs

Total Fees \$15,970.50

Total Invoice Amount \$15,970.50

Previous Balance \$0.00

Balance (Amount Due) \$0.00

Payment History:

Date	Type	Payment Description	Amount
1/31/2015	Payment - Trust Account		(\$15,970.50)

Trust Account Summary**Billing Period: 01/01/2015 - 01/31/2015****Project: General****Total Deposits**

\$19,935.50

Total Disbursements

\$35,906.00

Current Balance

\$4,029.50

Date	Transaction	Deposit	Disbursement	Balance
01/01/2015	Applied to invoice #21061		\$19,935.50	\$64.50
01/14/2015	Received From- [REDACTED]	\$19,935.50		\$20,000.00
01/31/2015	Applied to invoice #21094		\$15,970.50	\$4,029.50



1401 K Street NW
Suite 600
Washington DC, 20005
Phone: (202) 640-2850

Invoice 21061

Date Jan 01, 2015
Service Thru Dec 31, 2014

In Reference To: General (Fees)

Date	By	Services	Hours	Rates	Amount
12/09/2014	RL	Speak with [REDACTED] about [REDACTED] and discuss matter with J. Dillon; leave messages for Janna Hurley and Brian Walthers; speak with [REDACTED] and [REDACTED] regarding history of proceedings, and next steps; review documents from [REDACTED] and review GMU code of student conduct; speak with J. Hurley; participate telepathically in meeting with administrator; speak with B. Walthers and draft related email to M. Kaiser.	2.20	\$ 385.00/hr	\$847.00
12/09/2014	MK	Participate in a conference call with [REDACTED] [REDACTED]; review initial documents provided by [REDACTED] exchange email about a meeting at George Mason.	0.90	\$ 445.00/hr	\$400.50
12/10/2014	MK	Meet with [REDACTED] [REDACTED] about the case history.	0.30	\$ 445.00/hr	\$133.50
12/12/2014	MK	Begin to review the documents provided by [REDACTED] and GMU's student discipline policy.	0.80	\$ 445.00/hr	\$356.00
12/13/2014	MK	Listen to the audio of her call to [REDACTED] and the first 3 mp3s of the hearing.	1.60	\$ 445.00/hr	\$712.00
12/15/2014	AL	Researched FERPA laws to determine if George Mason violated the requirements when it released [REDACTED] information to the court; reviewed the documents related to [REDACTED] disciplinary process and hearing; researched the Department of Education guidance on appeals to determine if George Mason's process contradicted those suggestions; drafted a litigation hold letter to send to the University.	2.70	\$ 245.00/hr	\$661.50
12/15/2014	MK	Listen to audio files 4, 5, 6, and half of 7 of [REDACTED] hearing; review parts of the transcript of his CPO; speak with Allison Lansell about the case and research she has done in connection with it; meet with [REDACTED] to discuss next steps.	3.60	\$ 445.00/hr	\$1,602.00
12/16/2014	MK	Speak with [REDACTED] mother about [REDACTED]	0.20	\$ 445.00/hr	\$89.00
12/17/2014	MK	Finish listening to the recording of [REDACTED] disciplinary hearing; revise substantially and submit a litigation hold letter to the George Mason General Counsel's office.	3.80	\$ 445.00/hr	\$1,691.00

12/18/2014	MK	Review the Department of Education's guidance on appeals in Title IX cases; email Allison Lansell with suggestions and thoughts for what should be in the complaint and motion for a preliminary injunction, both as to the important facts and possible legal issues.	0.60	\$ 445.00/hr	\$267.00
12/18/2014	AL	Began drafting the complaint against George Mason University alleging breach of contract, negligence, and violations of Title IX and various state and federal constitution provisions.	2.00	\$ 245.00/hr	\$490.00
12/19/2014	AL	Drafted the fact section of the complaint describing the flawed process George Mason gives to those accused to sexual misconduct on campus and the issues with [REDACTED] adjudication.	4.80	\$ 245.00/hr	\$1,176.00
12/19/2014	MK	Speak with Allison Lansell about our approach to the briefs.	0.20	\$ 445.00/hr	\$89.00
12/20/2014	AL	Reviewed George Mason University's policies and procedures and drafted portions of the complaint explaining how those policies were violated, in breach of the Code of Student Conduct promises the University give to [REDACTED] described how various of the University officials acted negligently in handling [REDACTED] disciplinary process.	3.90	\$ 245.00/hr	\$955.50
12/21/2014	AL	Finished drafting the complaint and sent it to Mr. Kaiser; began drafting the preliminary injunction explaining why the court should require George Mason University to allow [REDACTED] to continue taking his classes and withhold any mark on his transcript until the case is fully resolved.	5.20	\$ 245.00/hr	\$1,274.00
12/22/2014	AL	Continued drafting the preliminary injunction including sections describing why [REDACTED] is likely to win on each of his claims, why he will be permanently harmed if the court does not grant an injunction, how the University will not be harmed by the preliminary injunction, and explaining that it is appropriate to protect someone like [REDACTED] who has been found responsible without a proper process and in violation of various laws.	9.70	\$ 245.00/hr	\$2,376.50
12/22/2014	MK	Review a draft of a complaint to file against George Mason; read cases on breach of contract based on a violation of a student code of conduct as a part of trying to decide if we should assert that claim.	3.80	\$ 445.00/hr	\$1,691.00
12/23/2014	MK	Revise the motion for a preliminary injunction's fact section and send it to [REDACTED] confer with Allison Lansell throughout the day about her legal research.	1.80	\$ 445.00/hr	\$801.00
12/23/2014	AL	Researched whether George Mason has sovereign immunity that would stop [REDACTED] from asserting claims against it; researched the proper process for suing George Mason University and determined what notice is necessary if we are going to sue the University; researched how to sue a state or state agency for a due process violation.	5.40	\$ 245.00/hr	\$1,323.00
12/24/2014	AL	Incorporated [REDACTED] changes into the complaint and preliminary injunction.	0.40	\$ 245.00/hr	\$98.00
12/30/2014	AL	Updated the complaint and preliminary injunction to reflect that the constitutional claims are against Mr. Ericson and Ms. Blank-Godlove; rearranged the order of the claims; drafted sections for the preliminary injunction explaining why [REDACTED] is likely to win his federal and state due process claims; incorporated [REDACTED] suggestions into the drafts.	11.30	\$ 245.00/hr	\$2,768.50
12/31/2014	MK	Discuss the [REDACTED] filings with Allison Lansell; briefly review her drafts before they went to [REDACTED] and his [REDACTED]	0.30	\$ 445.00/hr	\$133.50
Total Hours					65.50 hrs

Total Fees	\$19,935.50
Total Invoice Amount	\$19,935.50
Previous Balance	\$0.00
Balance (Amount Due)	\$0.00

Payment History:

Date	Type	Payment Description	Amount
1/1/2015	Payment - Trust Account		(\$19,935.50)

Trust Account Summary**Billing Period: 12/01/2014 - 01/01/2015****Project: General****Total Deposits**

\$20,000.00

Total Disbursements

\$19,935.50

Current Balance

\$64.50

Date	Transaction	Deposit	Disbursement	Balance
12/09/2014	Received From- [REDACTED]	\$10,000.00		\$10,000.00
12/17/2014	Received From- [REDACTED]	\$10,000.00		\$20,000.00
01/01/2015	Applied to invoice #21061		\$19,935.50	\$64.50